

Jeffrey R. Elliott, Esquire
Attorney I.D. 38147
KOZLOFF STOUDT
2640 Westview Drive
Wyomissing, PA 19610
610-670-2552

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CONNIE ONELY,	: CIVIL ACTION
Plaintiff	:
	:
v.	: No. 21-cv-4785
	:
REDNER'S MARKETS, INC.	:
Defendant	: Assigned to: Wendy Beetlestone, J.

EXHIBIT "B"

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CONNIE ONLEY : CIVIL ACTION
Plaintiff, :
 :
vs. :
 :
REDNER'S MARKETS, INC. : NO. 2:21-cv-04785-WB
Defendant. :

* * *

REMOTE VIRTUAL DEPOSITION

* * *

DEPONENT: SANDRA McGRORY
DATE: June 17, 2022
TIME: 10:06 a.m.
REPORTER: Cindy D. Liffman, PCR
Court Reporter - Notary Public

* * *

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Court Reporting Services
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Selbyville, Delaware 19975
215-946-7009

SANDRA McGRORY

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A P P E A R A N C E S

KARPF, KARPF & CERUTTI, P.C.

BY: ANDREW R. OLCESE, ESQUIRE

3331 Street Road

Two Greenwood Square

Suite 128

Bensalem, PA 19020

215-639-0801

aolcese@karpf-law.com

-- Representing the Plaintiff

KOZLOFF STOUT

BY: JEFFREY ELLIOTT, ESQUIRE

2640 Westview Drive

Wyomissing, PA 19610

610-370-6700

jelliott@kozloffstout.com

-- Representing the Defendant

R&K Reporting Inc.

Phone: 215-946-7009

rkreporting@gmail.com

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1 (It is agreed by and between
2 counsel that all objections, except as to
3 the form of the question be reserved
4 until the time of trial.

5 -----

6 SANDRA MCGRORY, having been duly sworn,
7 was examined and testified as follows:

8 -----

9 EXAMINATION

10 -----

11 BY MR. OLCESE:

12 Q. Good morning, again, Ms. McGrory. I
13 introduced myself a little bit off the record but my
14 name is Andrew Olcese and I represent Connie Onley in a
15 lawsuit against Redner's Markets.

16 My first question is the same I ask everyone
17 that I depose, have you ever previously been in a
18 deposition?

19 A. No.

20 Q. All right. So let me explain a little bit of
21 the procedure, what today is and a little bit of the
22 rules that we can try to comply with. So this is
23 pretty much a question and answer session. It's an
24 opportunity for me on behalf of Ms. Onley to ask you

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1 questions about her employment at Redner's and
2 ultimately, her separation.

3 So obviously, we are doing this remotely. I
4 can see you and you can see me. The first major thing
5 I want you to do is to try to keep your voice up.
6 Sometimes the audio might not pick up our responses.
7 Try to keep your voice as loud as possible every time I
8 ask you the questions. Okay?

9 A. Yeah.

10 Q. Can you say yes?

11 A. Yes.

12 Q. There, you go. I heard it good that time.
13 Okay.

14 Also even though you and I can obviously see
15 each other, if I ask you a question that could be
16 answered in, like, a yes or no and instead of giving a
17 verbal yes or no, you give, like, a head nod or head
18 bob or you say something like um-umms or uh-huhs, I'm
19 going to ask you to clarify whether that's a yes or no
20 because everything being said right now is written down
21 by the court reporter, Cindy and um-umms and head bobs,
22 they can't be written down clearly on a transcript. Is
23 that understood?

24 A. Understood.

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1 Q. Okay. The most important rule and I'll
2 probably mess this up throughout the day is to try to
3 maintain one person speaking at a time. So in that
4 regard, I'm going to ask you to try to refrain from
5 responding to the question before I fully get it out.
6 Sometimes in conversation, it comes up where you might
7 know what I'm about to ask and you want to answer it
8 quickly. I'm just going to ask you to hold off on that
9 and I'm going to try to do the same and let you give
10 your full response before I move on to the next
11 question. Is that okay?

12 A. That's fine.

13 Q. All right. At any point I ask you a question
14 that you don't understand, please let me know. Okay?
15 I'm not trying to ask you trick questions. Sometimes
16 it just might come out a little bit awkward so if
17 there's something I need to clarify or something you
18 don't understand, let me know that and I'll rephrase
19 it. Okay?

20 A. Understood.

21 Q. If you answer my question, though, I'm going
22 to assume that you understood what was being asked.
23 All right?

24 A. Okay.

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1 Q. Okay. At certain times your counsel might
2 object to my questions. Unless he explicitly tells you
3 to not answer a question, then you still would need to
4 answer every question even if there is an objection.
5 Does that make sense?

6 A. Yes.

7 Q. All right. Again, I mentioned this before, I
8 don't expect this to be a very long deposition but it's
9 certainly not an endurance test. If you need to take a
10 break, use the restroom, whatever, let me know. That's
11 perfectly fine. The only thing I ask is if I have a
12 question pending, you answer before we take the break.
13 Okay?

14 A. All right.

15 MR. ELLIOTT: The usual stipulations,
16 Andrew?

17 MR. OLCESSE: Yes, please.

18 MR. ELLIOTT: What you just mentioned
19 is the objection to form. I understand that.

20 MR. OLCESSE: That's correct.

21 MR. ELLIOTT: I have not discussed
22 reading and signing with Ms. McGrory which I
23 don't want to waive without either you
24 explaining to her or I can explain to her

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1 that she has that opportunity.

2 MR. OLCESE: She certainly has an
3 opportunity. I prefer no read and sign.
4 That's what I recommend to my clients.
5 Basically, Ms. McGrory, read and sign is an
6 opportunity that once a transcript is
7 completed, you have a chance to review it and
8 if you see any type of typos or something you
9 believe is a little bit off from what you
10 said, you have an opportunity to try and
11 correct that.

12 MR. ELLIOTT: But it's also coming to
13 me so it's also going to come to me so I will
14 do, I will note any such things as well. It
15 also takes a little bit more time to read and
16 sign it, send it back to the court reporter
17 so it's not uncommon. It would be
18 appropriate for that to be waived since
19 you're here as an employee of Redner's.

20 THE WITNESS: Okay.

21 MR. ELLIOTT: All right?

22 THE WITNESS: Yeah.

23 MR. OLCESE: Very good.

24 MR. ELLIOTT: Sorry to interrupt.

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1 MR. OLCESE: Not a problem at all.

2 Okay.

3 BY MR. OLCESE:

4 Q. Ms. McGrory, are you on any medication this
5 morning that would inhibit your ability to recall past
6 events?

7 A. No.

8 Q. All right. Is there any reason you can think
9 of sitting here today that you won't be able to answer
10 my questions fully and truthfully today?

11 A. No.

12 Q. Okay. Great.

13 Can you please state your full name for the
14 record?

15 A. Sandra McGrory.

16 Q. Okay. Are you known by any other names, maybe
17 a maiden name or anything like that?

18 A. Sandy.

19 Q. All right. What is your current home address?

20 A. 1203 Longford Road, Phoenixville, PA 19460.

21 Q. Please, your date of birth?

22 A. 5/3/1971.

23 Q. Where are you currently taking this
24 deposition?

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1 A. Jeff Elliott's office.

2 Q. At Kozloff Stoudt?

3 A. Yes.

4 Q. Other than your counsel, is anyone else in the
5 room with you?

6 A. No.

7 Q. All right. And I can see a little bit. Do
8 you have any documents in front of you that you're
9 referring to?

10 A. No.

11 Q. What, if anything --

12 MR. ELLIOTT: I can back this camera
13 back so you can see that.

14 MR. OLCESE: Thank you.

15 MR. ELLIOTT: Yeah, nothing. I'm
16 actually sitting at the other half of the
17 table.

18 BY MR. OLCESE:

19 Q. Ms. McGrory, what, if, anything, have you done
20 to prepare for today's deposition?

21 A. Went over with Mr. Elliott the information.

22 Q. Okay. And go ahead. I'm sorry.

23 A. That's what we have done.

24 Q. All right. And without sharing any content of

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1 your communication with your counsel, when did you go
2 over the information about this lawsuit?

3 A. On Monday.

4 Q. How long approximately did you meet with your
5 counsel on Monday?

6 A. Four hours.

7 Q. And did you review any documentation?

8 A. Can you repeat that?

9 Q. Did you review any documentation on Monday?

10 A. Yes.

11 Q. Can you identify any of those documents that
12 you reviewed?

13 A. The court filing.

14 Q. Anything else?

15 MR. ELLIOTT: Whatever you recall. She
16 looked at several things, many of which you
17 mentioned.

18 BY MR. OLCESE:

19 Q. So Ms. McGrory, throughout today's deposition,
20 I don't want you to refer to Mr. Elliott to look for
21 answers. I'm just asking what you know. Okay?

22 A. Okay.

23 Q. Do you remember any other documents that you
24 reviewed other than the lawsuit?

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1 A. The lawsuit, the deposition, the handbook.
2 There was a lot of papers.

3 Q. And you said the deposition. You reviewed the
4 deposition I assume of Ms. Onley?

5 A. Yes.

6 Q. Okay. All right. Other than your counsel,
7 did you discuss this deposition in preparation with
8 anybody else?

9 A. No.

10 Q. Did you talk to any of your former or current
11 colleagues at Redner's about today's deposition?

12 A. No.

13 Q. I ask this question of everyone being deposed,
14 have you ever been convicted of a crime previously?

15 A. No.

16 Q. All right. Okay. I assume you're currently
17 employed, Ms. McGrory?

18 A. Yes.

19 Q. And am I saying your last name, am I
20 pronouncing it correctly?

21 A. You're correct.

22 Q. All right. Very good. Where are you
23 currently employed?

24 A. Redner's.

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1 Q. And I understand Redner's operates a number of
2 different locations. Do you work at one specific
3 location currently?

4 A. I'm in Phoenixville.

5 Q. All right. Does that Phoenixville location
6 have a store number?

7 A. They do and I'm not sure of it. I just
8 transferred there just the other day.

9 Q. All right. When did you transfer to
10 Phoenixville?

11 A. Wednesday.

12 Q. Okay. And why did you transfer to
13 Phoenixville?

14 A. It's different opportunities.

15 Q. Okay. What is your current position at
16 Redner's?

17 A. Meat wrapper.

18 Q. Okay. Prior to your transfer to the
19 Phoenixville location, did you work at a different
20 location?

21 A. Collegeville.

22 Q. When did you begin working at the Collegeville
23 location?

24 A. Approximately two months ago.

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1 Q. Okay. So approximately April of 2022?

2 A. Correct.

3 Q. And were you a meat wrapper at the
4 Collegeville location?

5 A. Yes.

6 Q. All right. So prior to working at
7 Collegeville, did you work at any other location?

8 A. Audubon.

9 Q. When did you start working at the Audubon
10 location?

11 A. October of 2019.

12 Q. What was your position while at Audubon?

13 A. Meat wrapper.

14 Q. Prior to working at Audubon, did you work at
15 any other location at Redner's?

16 A. No.

17 Q. Fair to say you were hired by Redner's around
18 October of 2019?

19 A. Yes.

20 Q. It sounds like you always worked as a meat
21 wrapper, correct?

22 A. Yes.

23 Q. Do you know the store number at the Audubon
24 location?

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1 A. 67.

2 Q. And why did you transfer from the Audubon
3 location to the Collegeville location?

4 A. Sales were slow. The certain, the business
5 was slow at Audubon so I wanted more of a challenge and
6 the Collegeville store is a much bigger store.

7 Q. So. Am I correct then the transfer from
8 Audubon to Collegeville was your choice?

9 A. Yes.

10 Q. That's the same for Collegeville to
11 Phoenixville, was that your choice?

12 A. Yes.

13 Q. Currently, describe your duties as a meat
14 wrapper.

15 A. Meat wrapper wraps the meat. A meat wrapper
16 stocks the floor. A meat wrapper pulls dates of
17 expired items. A meat wrapper also does seafood. A
18 meat wrapper cleans.

19 Q. Okay.

20 A. A meat wrapper also gives direction to the
21 meat cutter, what meats are needed.

22 Q. Anything else?

23 A. No.

24 Q. Okay. Those duties you just generally

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1 described, have they been consistent as your job duties
2 throughout your employment at Redner's?

3 A. Yes. Besides when I was at Audubon, I also
4 had to deal with, they have a service case at Audubon
5 so I dealt with the service case which was fresh foods.
6 Then I also had to make specific foods that was on the
7 Redner's list.

8 Q. Okay. So you would have to make food. Is
9 that, like, for patrons, to give out samples possibly?

10 A. No. It's for us to make it for patrons to
11 buy, like, hamburgers, prepared, uncooked meats,
12 chicken, beef.

13 Q. And you didn't do that at Phoenixville or
14 Collegeville, correct?

15 A. They don't have that.

16 Q. Am I correct that Redner's stores have
17 different departments?

18 A. Yes.

19 Q. So a meat wrapper, what department is that
20 part of?

21 A. The meat department.

22 Q. And generally speaking, within the meat
23 department, what are the positions or titles within
24 that department?

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1 A. You have a meat wrapper. You have a cutter.
2 You have an assistant manager, a backup manager, per
3 se, a stocker, a closer, and depending if you're at a
4 fresh market or a Redner's warehouse market, some may
5 have had seafood clerks.

6 Q. Okay. And generally speaking, when you're
7 working as a meat wrapper, the job duties you talked
8 about a little bit earlier, are you doing them
9 consistently at every shift?

10 A. Yes.

11 Q. All right. All right. When did you transfer
12 from the Audubon location to the Collegeville location?

13 A. May. No, middle of April, middle April.

14 Q. Of 2022, right?

15 A. Yes.

16 Q. Okay. All right. So let me ask you this, as
17 of April of 2022, when you're still at Audubon, can you
18 identify the individuals that worked with you in the
19 meat department?

20 A. Shaun Rhoton, Marcos Mercon, myself, and there
21 was a new guy that just started and honestly, I can't
22 remember his name.

23 Q. Okay. Mr. Shaun Rhoton, as of April of 2022,
24 I just want to focus on that time, right before you

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1 left, what position did he hold?

2 A. Shawn was a meat cutter.

3 Q. Okay. And what race or ethnicity was Mr.
4 Rhoton?

5 A. He was Caucasian.

6 Q. And Mr. Marcus Mercon, what position did he
7 hold?

8 A. End meat manager.

9 Q. And what race or ethnicity was Mr. Mercon?

10 A. Caucasian to me but I knew he was Cuban. He
11 told me he was Cuban.

12 Q. You're Caucasian, correct?

13 A. Yes.

14 Q. Okay. And the new guy, the individual you
15 don't remember his name, do you know what position he
16 held?

17 A. He was going to be a seafood clerk for the
18 Lewes, Delaware store.

19 Q. So am I correct he was just at the Audubon
20 location possibly to get some training?

21 A. Yeah. He was strictly there for training
22 because the new store is not open yet.

23 Q. And what race or ethnicity was this new
24 individual?

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1 A. He was Caucasian.

2 Q. Okay. All right. So I want you to think back
3 as best you can. Out of these, including yourself,
4 four individuals that worked in the meat department at
5 the Audubon location as of around April of 2022, I
6 assume excluding the new individual, were the three of
7 you, meaning yourself, Rhoton and Mr. Mercon were all
8 working in the Audubon meat department as of September
9 2020 as well?

10 A. Yes.

11 Q. All right. Who else was working in the meat
12 department as of September of 2020 at Audubon?

13 A. He had Will Pultser(Ph), Virgil, Dave, who was
14 the closer for -- he was the cleaner at night, and I
15 think that's it.

16 Q. Okay. Was Ms. Onley working the meat
17 department as of September of 2020?

18 A. Yes.

19 Q. Okay. All right. You mentioned somebody.
20 I'm going to ask you the same questions I just asked
21 about the other individuals. Will Pultser, what
22 position did he have as of September of 2020?

23 A. He was a meat cutter apprentice.

24 Q. Okay. And what race or ethnicity is he?

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1 A. Caucasian.

2 Q. Okay. And to your knowledge, does Will
3 Pultser still work for Redner's?

4 A. Yes.

5 Q. Okay. You mentioned Virgil. Do you know
6 Virgil's last name?

7 A. I can't think of his last name at the top of
8 my head.

9 Q. No problem. Do you know what position he had
10 as of September of 2020?

11 A. Virgil was a stocker. He also closed the meat
12 department. He helped with the seafood case.

13 Q. Okay. And what race or ethnicity is Virgil?

14 A. I'm not sure.

15 Q. Okay. Then you mentioned Dave. Do you know
16 Dave's last name?

17 MR. ELLIOTT: No guessing. If you
18 don't know, I'd rather you say you don't
19 know.

20 THE WITNESS: I don't know.

21 BY MR. OLCSE:

22 Q. You mentioned he was a cleaner. Do you know
23 if he held any other position in September of 2020?

24 A. Strictly cleaner. He closed the department.

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1 He cleaned it.

2 Q. What race or ethnicity is Dave?

3 A. Caucasian.

4 Q. Okay. Am I correct then that as of September
5 2020, based on the employees we just talked about, Ms.
6 Onley was the only Black employee?

7 A. Yes.

8 Q. Okay. All right.

9 MR. ELLIOTT: May I ask for
10 clarification, Andrew? You asked a very
11 broad question. The only Black employee, you
12 mentioned September of 2022 in that 67 store
13 in that meat department or do you mean
14 Redner's wide?

15 MR. OLCESSE: I was talking about the
16 meat department.

17 And again, Ms. McGrory, if there's
18 anything I asked about, you're confused on or
19 need clarification, please let me know.

20 Okay?

21 THE WITNESS: Yes.

22 BY MR. OLCESSE:

23 Q. All right. Other than Ms. Onley, is there
24 anyone you're aware of that you worked with in the meat

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1 department at Audubon as of September of 2020 that
2 currently does not work for Redner's?

3 A. Can you repeat that?

4 Q. Sure. Other than Ms. Onley, is there anyone
5 you know of that you worked with in September of 2020
6 in the meat department at Audubon that does not work
7 for Redner's?

8 A. Dave does not work for Redner's anymore.

9 Q. Okay.

10 A. And Virgil.

11 Q. Okay. Regarding Dave first, do you know if
12 his separation was voluntary or involuntary?

13 A. It was voluntary. He retired.

14 Q. Okay. Then Virgil, same question, was his
15 separation voluntary or involuntary?

16 A. Voluntary.

17 Q. Okay. Currently, do you work full-time?

18 A. Yes.

19 Q. Am I correct about 40 hours per week?

20 A. Yes.

21 Q. During your tenure with Redner's whether at
22 Collegeville, Audubon or Phoenixville, have you always
23 worked full-time?

24 A. Yes.

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1 Q. Currently, do you have a set schedule?

2 A. Yes.

3 Q. So what is your current schedule, meaning the
4 days you work and the hours you work?

5 A. I work Monday, Tuesday, Wednesday, Thursday
6 from 6:00 to 2:30 a.m. I'm off Friday. I work Saturday
7 from 6:00 to 2:30 p.m. I'm off Sunday.

8 Q. Okay. I just want to clarify. Monday,
9 Tuesday, Wednesday Thursday and Saturday, am I correct
10 on every day, you work 6:00 a.m. to 2:30 p.m.?

11 A. Correct.

12 Q. Have you always worked that shift regardless
13 of what location you worked at?

14 A. No.

15 Q. Okay. So when did you start working your
16 current schedule?

17 A. Within the last year.

18 Q. Okay. Did you have a set schedule when you
19 worked at Audubon?

20 A. No.

21 Q. All right. As best you can recall, September,
22 October of 2020, what schedule did you work at that
23 time?

24 A. I was 6:00 to 2:30 or 7:00 to 3:30 or 10:30

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1 a.m. to 7:00 p.m.

2 Q. Okay. And did you have a set schedule in
3 terms of days of the week that you worked while you
4 were at Audubon between September and October of 2020?

5 A. Not that not can recall, no.

6 Q. Okay. So if I'm correct then, your schedule
7 week to week would change, what days of the week you
8 worked; is that right?

9 A. Yes.

10 Q. In your role as a meat wrapper, do you
11 supervise any employees?

12 A. No.

13 Q. Okay. Have you ever supervised employees
14 while being employed at Redner's?

15 A. No.

16 Q. Currently, who do you report to directly?

17 A. My meat manager.

18 Q. Who is that?

19 A. His name is Rob.

20 Q. Do you know Rob's last name?

21 A. I do not.

22 Q. Prior to Rob being your meat manager, who did
23 you report directly to at Collegeville?

24 A. Dennis.

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1 Q. Do you know Dennis' last name?

2 A. I do not.

3 Q. Prior to being supervised by Dennis, who did
4 you report directly to at the Audubon location?

5 A. Marcus Mercon.

6 Q. When you were hired in 2019, were you
7 supervised by Mr. Mercon at that point?

8 A. Yes.

9 Q. Fair to say Mr. Mercon was your supervisor,
10 your meat manager at all times that you worked at
11 Audubon?

12 A. Yes.

13 Q. Other than the meat manager, do you report to
14 any other position?

15 A. I reported to a deli. I also worked in a
16 deli.

17 Q. Did you work at a deli in the Audubon
18 location?

19 A. Yes.

20 Q. And who did you report to in the deli
21 department?

22 A. Give me a moment.

23 Q. No problem.

24 A. I reported to a Steve. And at the time, I'm

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1 sorry. I forget her name.

2 Q. That's okay.

3 A. She was the deli manager when we first opened.

4 Q. At any point during today's deposition; I'm
5 asking a lot of questions, we're talking about things
6 that happened in the past, if there's something that
7 pops in and you remember it, feel free if you'd like to
8 share with me whatever you remember. All right?

9 A. Yes.

10 Q. At the Audubon location, as of September,
11 October 2020 who was the store manager?

12 A. Karl Michener.

13 Q. Did the Audubon location at that time have an
14 assistant store manager?

15 A. Yes.

16 Q. Who was that?

17 A. That was Jim.

18 Q. Do you know Jim's last name?

19 A. I forget it.

20 Q. Okay. Was there only one assistant store
21 manager?

22 A. Yes.

23 Q. Is fair to say that Jim and Karl Michener were
24 the highest positions in charge at the Audubon location

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1 as of September of 2020?

2 A. Yes.

3 Q. And what race or ethnicity is Mr. Michener?

4 A. I'm assuming he's Caucasian.

5 Q. What race or ethnicity is Jim?

6 A. Assuming he's Caucasian.

7 Q. Okay. And was Mr. Michener, to your
8 knowledge, the store manager at Audubon during your
9 time period working there?

10 A. Yes.

11 Q. All right. Does Redner's have an employee
12 handbook?

13 A. Yes.

14 Q. Do you recall receiving a copy of that
15 handbook when you started to work on Redner's in 2019?

16 A. Yes.

17 Q. Did you have to go through any sort of
18 training or orientation when you were hired?

19 A. Yes.

20 Q. All right. And were you issued a physical
21 copy of the handbook to keep?

22 A. Yes.

23 Q. Do you remember having to sign off on that
24 handbook that you received it?

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1 A. Yes.

2 Q. When you received that handbook; I know we're
3 going back years now, but did you read through
4 everything?

5 A. I read through my job description and I read
6 through the general information of what to wear, what
7 not to wear.

8 Q. So is it fair to say then you don't know all
9 the policies within the Redner's handbook?

10 A. I don't know all the policies.

11 Q. When you transferred from Audubon to
12 Collegeville, were you issued a new handbook?

13 A. No.

14 Q. Okay. And when you transferred from
15 Collegeville to Phoenixville, were you issued another
16 handbook?

17 A. No.

18 Q. Have you received a handbook from Redner's at
19 any time during your employment other than when you
20 first started?

21 A. I personally did not but it was always
22 available in the break room.

23 Q. What do you mean by that?

24 A. It's available in the break room to look at.

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1 Q. Like, is there a hard copy that you can scroll
2 through or do you have to go on a computer?

3 A. You can -- it's a hard copy and you can also
4 go to our web portal and look at that.

5 Q. Do you remember on any occasion you going into
6 the break room and having to review the handbook
7 because you had a question about something?

8 A. Yes.

9 Q. When did you do that?

10 MR. ELLIOTT: Object to the form.

11 THE WITNESS: 2021.

12 BY MR. OLCESE:

13 Q. 2021?

14 A. Right.

15 Q. And when you refer to 2021, are you thinking
16 of just one occasion when you went to the handbook to
17 review it?

18 A. Yes.

19 Q. Can you remember going to the handbook to
20 review it in the break room on more than one occasion?

21 A. No.

22 Q. Okay. Do you remember why you wanted to look
23 at the handbook in 2021?

24 A. Our dress code.

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1 Q. Okay. Did you have a question about what was
2 appropriate regarding the dress code?

3 A. Yes.

4 Q. Okay. All right. Let's shift gears a little
5 bit. Do you recall the employment of Connie Onley?

6 A. Yes.

7 Q. And you worked with her, correct?

8 A. Yes.

9 Q. What location did Ms. Onley work at?

10 A. 67 Audubon.

11 Q. Audubon, did you work with Ms. Onley at any
12 other location other than Audubon?

13 A. No.

14 Q. Do you remember when she started working at
15 the Audubon location?

16 A. October of 2019.

17 Q. Okay. Fair to say that was around the same
18 time that you started working at Redner's?

19 A. Yes.

20 Q. Did she train you in any way when you started
21 in 2019?

22 A. No.

23 Q. Was it your understanding when you started
24 your employment at Redner's that Ms. Onley had worked

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1 at a previous store location before working at Audubon?

2 A. Yes.

3 Q. I'm sorry. Was that a yes?

4 A. Yes.

5 Q. Okay. Do you know what store she previously
6 worked at before going to Audubon?

7 A. Lansdale.

8 Q. Do you know the store number for Lansdale?

9 A. I do not.

10 Q. At Audubon, what position did Ms. Onley hold?

11 A. She was a counter assistant. I'm really not
12 sure what position she held. I can't answer that.

13 Q. Okay. Did she have, to your knowledge, the
14 same job duties that you had when you started Redner's?

15 A. Yes.

16 Q. Okay. Do you know what her schedule was at
17 the Audubon location?

18 A. Six a.m. to 2:30 p.m.

19 Q. Do you remember her schedule while you worked
20 with her at Audubon being consistent, meaning the same
21 hours each time she worked and the same days of the
22 week?

23 A. Yes.

24 Q. What days of the week did she work?

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1 A. She worked every day. I know she was off
2 Sundays, and I think it was Wednesday.

3 Q. So it sounds like Monday, Tuesday, Thursday,
4 Friday and Saturday was her days?

5 A. Yes.

6 Q. Okay. So I know we spoke about your schedule
7 and how at the time you worked at Audubon varied a
8 little bit but comparing your schedule to Ms. Onley's
9 schedule, it looks like every week, you two would have
10 worked around the same time at least maybe three days
11 per week. Does that sound accurate to you?

12 A. Yes.

13 Q. And talking about the meat department at the
14 Audubon location, can you generally just describe as
15 best you can, how it's situated or how it looks in that
16 department?

17 A. Looking from the outside, you have a big case
18 that holds the meat and the other side holds the
19 seafood. You walk through a big brown door and to the
20 left is the sliding doors to get to that case along
21 with two big tables to prepare the meat and seafood.

22 And in the back room, you have where the
23 cutters are. To the far left, you have the meat
24 wrapper and to the far right is where we prepare

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1 sausage. There was an off scale for the deli to come
2 in and print stuff out if they needed to.

3 Q. And generally speaking, when you were working
4 at Audubon and you were working with Ms. Onley doing
5 meat wrapping duties, would you and Ms. Onley be
6 generally in close proximity at the far left of the
7 meat department?

8 A. If you're walking into the meat department, it
9 would be to the far left, yes.

10 Q. Okay. And as you described the meat
11 department and correct me if I'm wrong, if I'm a patron
12 and I'm looking at the glass counter, everything you
13 described in the meat department, is that within my
14 vision? Is that all open and I can see back there?

15 A. Yes.

16 Q. Okay. All right. And the only separation or
17 wall so to speak in the meat department if I'm correct
18 was just between the seafood and I guess the other
19 meats, that brown door?

20 A. Yes.

21 Q. Okay.

22 A. Everything was open.

23 Q. Can you estimate as best you can how big or
24 how, if you can describe how big is the meat

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1 department?

2 MR. ELLIOTT: Object to the form.

3 THE WITNESS: That, I can't.

4 MR. OLCESE: Okay.

5 BY MR. OLCESE:

6 Q. Ms. Onley, when she worked at Audubon, am I
7 correct that she was also supervised by Marcos?

8 A. Yes.

9 Q. When you first started working at Audubon and
10 you met Ms. Onley, did you two get along?

11 A. Yes.

12 Q. Okay. You were friendly with her?

13 A. I was a co-worker to her.

14 Q. Would you say you at least were cordial to one
15 another?

16 A. Yes.

17 Q. Was that a yes or no?

18 A. Yes.

19 Q. Okay. All right. When you two would work
20 together, would you talk to each other on a regular
21 basis?

22 A. No. Not every day.

23 Q. So sometimes even though you worked together
24 and in close proximity maybe a few hours each shift,

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1 you could possibly go a whole shift without saying a
2 word to Ms. Onley?

3 A. Yes.

4 Q. And she would sometimes do the same with you?

5 A. Yes.

6 Q. But when you did talk with her, you did
7 generally speak just pleasantries and being cordial,
8 what did you two talk about?

9 A. Life in general.

10 Q. Understood. So you talked about things that
11 were not always work-related, right?

12 A. Yes.

13 Q. Obviously, you also talked about work-related
14 things like colleagues or maybe new directives from
15 management?

16 A. No.

17 Q. You never talked about colleagues or
18 directives from the management?

19 A. No.

20 Q. Did you two talk about family?

21 A. Yes.

22 Q. Are you married, Ms. McGrory?

23 A. I am married.

24 Q. Did you share that with Ms. Onley?

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1 A. Yes.

2 Q. Do you know if Ms. Onley was married?

3 A. Her husband's deceased.

4 Q. She shared that obviously, with you at some
5 point during your employment?

6 A. Yes.

7 Q. So at least on some occasions, Ms. Onley would
8 share with you private, personal information, right?

9 A. Yes.

10 Q. Fair to say you would do the same to Ms.
11 Onley?

12 A. I was selective.

13 Q. What do you mean by that?

14 A. I only give information out that I choose to
15 give out.

16 Q. Well, certainly. I understand that. But you
17 would talk about being married or having a husband I
18 assume, right?

19 A. Yes.

20 Q. Do you have any children, Ms. McGrory?

21 A. I do.

22 Q. Did you ever talk to Ms. Onley about your
23 children?

24 A. Not so much.

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1 Q. Not so much but maybe on occasions?

2 A. More so when my daughter was getting ready to
3 go to college.

4 Q. That's understandable. You shared with Ms.
5 Onley that your daughter is getting ready to go to
6 college?

7 A. Yes, correct.

8 Q. Other things about life, did you talk about,
9 like, the current events that were happening in the
10 world?

11 A. Yes.

12 Q. Okay. Did you talk about politics?

13 A. We both did.

14 Q. Right. Of course. Ms. Onley talked about
15 current events that were happening around the world at
16 that time, right?

17 A. Yes.

18 Q. And I know I'm being general right now in my
19 time. I'll get more specific later but you and Ms.
20 Onley worked at the Audubon store, sounds like for
21 approximately one year from October 2019 to October
22 2020. Does that sound accurate to you?

23 A. Yes.

24 Q. All right. Is it fair to say within that

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1 year, you got to know Ms. Onley a little bit?

2 A. Yes.

3 Q. Would you agree she got to know certain things
4 about you?

5 A. What I indulged about.

6 Q. Understood. Of course. Did you two also ever
7 gossip about your other colleagues in the meat
8 department?

9 A. I don't gossip.

10 Q. You don't gossip? You don't talk about anyone
11 else?

12 A. I'm very direct.

13 Q. Do you believe Ms. Onley would gossip with the
14 other colleagues in the meat department?

15 A. Yes.

16 Q. She would tell you about her co-workers,
17 things that were happening in their lives?

18 A. Yes.

19 Q. Okay. Understood. Did you ever get together
20 and meet Ms. Onley outside of work?

21 A. No.

22 Q. Okay. And prior to September of 2020, did you
23 ever bring a concern to management about Ms. Onley?

24 A. Yes.

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1 Q. When did you do that?

2 A. I can't remember if it was my -- I can't
3 remember, Redner's a 60 day or 90 day review.

4 Q. Okay.

5 A. But it was during my review, I brought to my,
6 Marcos' attention that I felt very uneasy around Connie
7 and very uncomfortable with the things she was talking
8 about.

9 Q. You brought this to Marcos Mercon's attention?

10 A. Yes.

11 Q. Did you tell anyone else other than Marcos?

12 A. I've made mention to Karl if I'm not mistaken,
13 Karl Michener.

14 Q. Is that around that 60 or 90 day time period
15 you're talking about when you started your employment?

16 A. Yes.

17 Q. When you talked to Marcos and Karl about this,
18 was this in person, you verbally saying it?

19 A. Yes. Hoping that they would have written it
20 down or I would have taken the time to write it down.

21 Q. Did you write anything down at the time when
22 you were having that 60 day or 90 day review with
23 either Karl or Marcos?

24 A. No. I just read my review and signed it.

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1 Q. The review that you signed, that didn't have
2 any mention about Ms. Onley, I presume; is that right?

3 A. No.

4 Q. Do you recall observing either Marcos or Karl
5 when you were expressing your concerns about Ms. Onley,
6 take notes or writing anything down?

7 A. No.

8 Q. Okay. Prior to talking to Karl and Marcos
9 about Ms. Onley, during the 60 or 90 day review that
10 we're speaking of, did you ever address it directly
11 with Ms. Onley that you felt some concerns or felt
12 awkward or uneasy about things she was saying?

13 A. I was afraid to.

14 Q. Why were you afraid to?

15 A. She's very controversial.

16 Q. What does that mean?

17 A. I'm going to say it bluntly, looking for
18 issues.

19 Q. Why do you say she was looking for issues?

20 A. Because she was very controversial.

21 Q. I'm only asking. I'm not trying to repeat the
22 questions. I apologize if it's confusing. I'm trying
23 to find out as a person on the outside hearing this,
24 what to you was controversial or what to you

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1 demonstrated that she was looking for issues?

2 A. She was very clear to me that she had
3 previously sued a former employee and she always talked
4 about lawyering up.

5 Q. Did she say what she would be lawyering up
6 for?

7 A. Racism.

8 Q. Did she ever express to you that she
9 experienced racism?

10 A. Yes.

11 Q. In terms of her performance, would you
12 describe her as a good worker?

13 A. No.

14 Q. Why not?

15 A. She was very hard to get along with. She was
16 very controversial. She was very argumentative and
17 almost always seemed like she was looking to pick an
18 argument.

19 Q. Prior to September of 2020, did you ever have
20 an argument with Ms. Onley?

21 A. I stayed clear. I stayed clear of Connie.

22 Q. But is that a no?

23 A. No.

24 Q. And you told me about her, again, like you

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1 spoke earlier, controversial, you said argumentative
2 but in terms of her performance, doing her job duties,
3 you said she was not good at that and I'm asking why do
4 you believe she was not good at her performance?

5 A. She didn't help as a team. She only did what
6 Connie wanted to do.

7 Q. Do you remember any time that you worked with
8 her, Ms. Onley receiving discipline based on her
9 performance?

10 A. No.

11 Q. Okay. Do you know when Ms. Onley separated
12 from Redner's?

13 A. I do not.

14 Q. If I told you early October 2020, does that
15 refresh your recollection a little bit?

16 A. Yes.

17 Q. That sounds accurate to you?

18 A. Right, correct.

19 Q. Other than just saying early October 2020, do
20 you know more specifically what day in October, not day
21 of the week but the 1st, the 2nd, the 4th, whatever?

22 A. No.

23 Q. Okay. All right. Was her separation
24 involuntary?

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1 A. Yes.

2 Q. She was terminated, correct?

3 A. Yes.

4 Q. Okay. Do you know who made the decision to
5 terminate Ms. Onley?

6 A. I do not.

7 Q. Were you a part of that decision to terminate
8 her?

9 A. No. I didn't know she was terminated
10 initially.

11 Q. You -- I didn't mean to cut you off. Go
12 ahead.

13 A. I didn't know she was terminated initially. I
14 was told after the fact.

15 Q. Understood. Who told you after the fact that
16 Ms. Onley was terminated?

17 A. Marcos Mercon.

18 Q. Approximately when did he tell you this?

19 A. A couple days after her termination.

20 Q. Okay. Was this just an in person
21 conversation?

22 A. Well, as a team, we needed to know.

23 Q. Was Marcos, like, having a team meeting and
24 telling everyone including you?

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1 A. Yes.

2 Q. All right. I understand. Okay. After Marcos
3 told you Ms. Onley was terminated, was there ever a
4 point in time that you learned why Ms. Onley was
5 terminated?

6 A. No.

7 Q. So sitting here today, am I correct you don't
8 know why Ms. Onley was terminated?

9 A. Correct. I do not know.

10 Q. Has anyone at Redner's ever communicated to
11 you that Ms. Onley was terminated for violating a
12 policy in Redner's handbook?

13 A. Yes.

14 Q. Who informed you of that?

15 A. Karl Michener.

16 Q. Did Mr. Michener ever tell you which policy
17 Ms. Onley purportedly violated that led to her
18 termination?

19 A. Yes.

20 Q. What policy is that?

21 A. Sexual harassment.

22 Q. Okay. So hearing that from the store manager,
23 Mr. Michener, is it your understanding that she was
24 terminated for violating the sexual harassment policy?

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1 A. Yes.

2 Q. Okay. So you are aware at least of some
3 reason why she was terminated, correct?

4 A. Yes.

5 Can I back up?

6 Q. Go ahead.

7 A. I also had to sit through an unemployment
8 phone call with Karl Michener, myself and Shaun and
9 Alexis.

10 Q. We talked about Shaun earlier, Mr. Rhoton.
11 Alexis, who are you referring to?

12 A. Foreman.

13 Q. Okay. And am I correct she's human resources?

14 A. Yes.

15 Q. All right. My question for you is did you
16 learn from Karl Michener that Ms. Onley violated the
17 sexual harassment policy at that unemployment hearing
18 or prior?

19 A. At the unemployment hearing.

20 Q. That was the first time you heard that?

21 A. Yes.

22 Q. Okay. Understood. Did you ever come to learn
23 that Ms. Onley was terminated as a result of you filing
24 a complaint against her?

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1 A. Can you repeat that?

2 Q. Did you ever come to learn at any point that
3 you learned Ms. Onley was terminated after you filed a
4 complaint against her?

5 A. I found out everything a couple days later
6 after she was fired, terminated.

7 Q. Right.

8 A. But I didn't feel that it was directed at me.

9 Q. When you say directed at you, you're saying
10 you don't believe your complaint was the reason Ms.
11 Onley was then terminated?

12 A. No. I feel my complaint was the reason to be
13 terminated.

14 Q. Understood. Okay. All right. And you
15 complained that Ms. Onley was harassing you; is that
16 right?

17 A. Harassing me and how.

18 Q. I'm sorry. I'm -- are you asking me or what?

19 A. I'm asking how she -- there's multiple things
20 that happened so I'm not sure what you're directing at.

21 Q. I'm going to try to get into more specifics in
22 a little bit. I'm talking now in a broad scope, kind
23 of building into it.

24 Generally speaking, did you complain that Ms.

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1 Onley was harassing you?

2 A. I wrote a statement.

3 Q. Do you remember if you wrote in that statement
4 alleging Ms. Onley was harassing you?

5 A. Yes.

6 Q. Okay. And do you remember when you wrote the
7 statement?

8 A. October of 2020.

9 Q. If told you it was October 1st, 2020, does
10 that sound accurate to you?

11 A. Yes.

12 Q. Do you remember testifying about when you
13 submitted this written complaint during that
14 unemployment hearing that you spoke of?

15 A. Yes.

16 Q. When you wrote that statement, who did you
17 write it to?

18 A. I was in was the office writing it to Jim.

19 Q. When you say office -- I'm sorry. Go ahead,
20 please.

21 A. I wasn't writing it directly to Jim. I was
22 writing everything that happened.

23 What was the other question?

24 Q. No. That's fine. You're writing it to Jim.

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1 You were in the office. What office are you referring
2 to, the meat department? Is this management?

3 MR. ELLIOTT: Object to the form.

4 THE WITNESS: Store manager's office.

5 BY MR. OLCESE:

6 Q. Okay. When you were writing it, was anyone
7 else present in the room other than yourself and Jim?

8 A. No.

9 Q. And other than you writing the statement we're
10 talking about on October 1st, 2020 and other than you
11 verbally complaining to Mr. Michener and Mr. Mercon
12 after your 60 or 90 day review, is there any other
13 occasion that in any form that you made a complaint
14 about Ms. Onley?

15 A. Yes.

16 Q. Okay. So what instance are you thinking?

17 A. I was approached by Marcos Mercon if I ever
18 felt uncomfortable in the department, if I felt like I
19 was being discriminated against and I explained to him
20 no.

21 Then I was approached by Marcos a few months
22 later in regards to the same situation and at that
23 point, I went and I approached Karl Michener and asked
24 to speak with him and sat with him in his office and

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1 explained to him that I don't appreciate being
2 approached that myself and Connie are being
3 discriminated against in the department. I don't feel
4 that way. I don't want to feel that way because that
5 is not what is happening.

6 Q. Okay. When did you speak -- the time period
7 that you're talking about now, when did you speak to
8 Mr. Michener about that?

9 A. Probably August of 2020.

10 Q. Do you remember writing a statement in August
11 of 2020?

12 A. No.

13 Q. Okay. So we have now to my knowledge, three
14 different complaints relating to Ms. Onley. I just
15 want to cover them to make sure there aren't any
16 others. The 60 or 90 day probation time, Mr. Michener
17 and Mr. Mercon, one in August of 2020 to Mr. Michener
18 that you don't feel that you're discriminated against
19 and don't want to be lumped into that and three, the
20 written statement on October 1st, 2020. Are there any
21 other occasions you can think of where you made a
22 complaint in regard to Ms. Onley?

23 A. No.

24 Q. Okay. Have you ever complained about anyone

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1 else during your entire tenure at Redner's other than
2 Ms. Onley?

3 A. Yes.

4 Q. So the most recent time, I want to ask you a
5 kind of two part question, who were you complaining
6 about and when did you complain?

7 A. I complained to the front end manager in
8 regards to a co-worker's hair.

9 Q. And when did this complaint take place?

10 A. It was the summer of 2020 and I'm not exactly
11 sure of the month.

12 Q. Understood. Okay. So summer of 2020, you
13 complained to the front end manager about a co-worker's
14 hair. The first question, do you know the name of the
15 front end manager you complained to?

16 A. Deb.

17 Q. Do you know Deb's last name?

18 A. I do not.

19 Q. What race or ethnicity is Deb?

20 A. Caucasian?

21 Q. You said you were complaining about a
22 co-worker's hair. What did you mean by that?

23 A. There was a revision somewhere in our handbook
24 and it is clearly stated we were not allowed to have

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1 red or purple or blue hair and I found it very
2 offensive and I disagreed that this co-worker had
3 purple hair.

4 Q. What is that co-worker you're referring to,
5 that individual's name?

6 A. I do not remember her name.

7 Q. Do you know what position she held?

8 A. Cashier.

9 Q. Okay. And what race or ethnicity was this
10 cashier?

11 A. She was African.

12 Q. Fair to say she was Black?

13 A. Yes, but she had specific, yes. Black is
14 fine.

15 Q. Okay. And what did you find offensive about
16 her purple hair?

17 A. Because there were times when they were being
18 told about our hair colors and our piercing so I found
19 it offensive that we were being told, then that they
20 should be told.

21 Q. Just so I understand, were you more upset that
22 there was maybe unfair treatment to you and the meat
23 department if she had purple hair or you, when you say
24 offensive, you were personally bothered by her having

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1 purple hair?

2 A. No. It bothered me that she, that they were
3 -- we were being approached about our color hair and
4 our piercing. So it's not directed just directly at
5 her. It was directed as a whole. It was in the
6 handbook.

7 Q. Okay. Other than this complaint where you
8 complained about purple hair at the cashier and we
9 talked about Ms. Onley, were there any other occasions
10 that you think during your entire tenure at Redner's
11 where you complained about an employee?

12 A. No.

13 Q. So am I correct there's only two employees
14 during the past approximate three years of your
15 employment that you complained about?

16 A. Yes.

17 Q. Okay. Both were Black, correct?

18 A. Yes.

19 Q. All right. Did you ever come to learn that
20 the employee that you complained about, the cashier
21 with the purple hair, was she disciplined for having
22 purple hair?

23 A. No.

24 Q. Do you know if she works at Redner's?

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1 A. She may.

2 Q. Okay. So it's your understanding she wasn't
3 terminated after your, in regards, in response to your
4 complaint of her having purple hair; is that right?

5 A. No. We went in for a meeting together.

6 Q. So who was present for this meeting?

7 A. Karl Michener, Jim, Dakota, and if I'm not
8 mistaken, I think Steve was there.

9 Q. Was the cashier present for the meeting?

10 A. Yes.

11 Q. You mentioned Dakota, do you know Dakota's
12 last name?

13 A. I do not.

14 Q. Do you know what position Dakota had at the
15 time of the meeting?

16 A. Grocery manager.

17 Q. Okay. You mentioned Steve. Do you know
18 Steve's last name?

19 A. I do not.

20 Q. Did you know what position Steve held at the
21 time of this meeting?

22 A. Overnight manager. Excuse me, frozen manager.

23 Q. And generally speaking, what was discussed
24 during that meeting?

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1 A. Well, I was approached by the individual.

2 Q. Okay.

3 A. And she approached me and said I hear you have
4 a problem with my hair and I explained to her, I do. I
5 said we get in trouble for what we have so it's unfair
6 that you can have this.

7 And the manager that confronted her or that I
8 talked to and her were having words and I straight out
9 told them, if you have something to say, say it to me.
10 In fact, let's take it to the office. I told Karl and
11 all them, I said listen, I have a real problem here. I
12 approached a manager. Now, I'm being confronted by
13 other people about this issue.

14 Q. So it sounds like you had a problem. You went
15 to management about your concern and then somehow, that
16 trickled back to the cashier?

17 A. Yes.

18 Q. Right. And to your understanding, how did
19 that meeting with Karl, Jim, Dakota and Steve, how did
20 it resolve or how did it end?

21 A. It ended with an understanding and myself and
22 the cashier agreed upon, you know, we agreed and we
23 went about our way.

24 Q. Did you ever receive any form of discipline

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1 for bringing that concern and subsequently having that
2 meeting?

3 A. No.

4 Q. Do you know if the cashier ever received
5 discipline for that event?

6 A. No.

7 Q. Do you remember after that meeting if the
8 cashier changed her hair color in response to that
9 meeting?

10 A. She did not.

11 Q. Okay. All right. Did that bother you that
12 she didn't change her hair color?

13 A. No.

14 Q. I want to go back to October 1st of 2020 about
15 Ms. Onley. You issued a written complaint so my
16 question is, that complaint on October 1st of 2020, was
17 it in response to something that happened on that same
18 day?

19 MR. ELLIOTT: Objection to the form.

20 THE WITNESS: Am I allowed to answer?

21 MR. ELLIOTT: Uh-huh.

22 THE WITNESS: Yes.

23 BY MR. OLCESSE:

24 Q. Just to remind you, so unless Jeff tells you,

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1 Ms. McGrory, don't answer that question, even when he
2 objects for the record, you still need to answer.
3 Okay?

4 A. Okay.

5 Q. All right. It was in response to something
6 that happened on October 1st, 2020. In your words,
7 what happened on that day, just October 1st, 2020, that
8 led you to write that complaint?

9 A. I was getting dishes and Connie had came out
10 from the floor into the meat room and she approached me
11 and said that you White folks, you White Trump
12 supporters is what's causing all these riots and I
13 turned to her and I said we're not discussing this.
14 And she continued and there was words about Antifa that
15 were brought up, words about Trump brought up and then
16 words about the Proud Boys brought up and she just
17 wouldn't give up.

18 And I turned to her and I said, Connie, we're
19 ending this discussion and she would not give up. And
20 I threw the pan into the soapy water and I walked out
21 and Connie continued to follow me. I turned back and
22 asked her to stop following me. She continued to
23 follow me. I walked out the receiving door to get away
24 from Connie. She continued to follow me outside. I

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1 yelled to her to just leave me alone, get the "F" back
2 inside and I walked up the back side of Redner's.

3 I turned around and Connie was gone so I kind
4 of just took a breather and relaxed out there for a
5 little while.

6 Q. Okay. Let me just try and break that part so
7 I fully understand. You say you left the receiving
8 door. Just is that a door in, out of the meat
9 department?

10 A. No. That's a door that goes outside.

11 Q. Okay.

12 A. Product comes in.

13 Q. So is that receiving door from the outside
14 directly into the meat department?

15 A. No.

16 Q. Go ahead, please.

17 A. Had to walk down a hallway.

18 Q. So you leave the meat department, you walk
19 down a hallway. Is this hallway that you walk down
20 within public view, the patrons can see you?

21 A. No.

22 Q. Then you hit the receiving door to go outside?

23 A. Yes.

24 Q. And you have a breather as you say outside?

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1 A. Yes.

2 Q. Again, just for clarity in the record, I'm not
3 trying to be offensive but we need to actually clarify
4 some of the things you say. When you say get back, get
5 the "F" back, you mean fuck?

6 A. Yeah. Get the fuck away from me.

7 Q. Thinking back, this exchange you just
8 described between yourself and Ms. Onley, from when it
9 started until the time you're outside catching a
10 breather, how long did that take?

11 A. 10, 12 minutes.

12 Q. And after you caught your breath so to speak,
13 at that point, you came back inside, went to the
14 manager's office and wrote your statement?

15 A. No.

16 Q. Okay.

17 A. I had to ring the bell to come back into the
18 store because it's a locked door. I was met at the back
19 door by Jim and he asked me if everything was okay and
20 I told him no. I was clearly upset.

21 Q. Okay.

22 A. Frustrated. And he asked me if I wanted to
23 write a statement and I said yes and he walked me up to
24 the office. And when I walked up to the office, I

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1 asked him if he wanted to know everything. He said you
2 write down whatever you want. I just started writing.

3 Q. Started writing. Understood. Okay. I'm
4 going to come back to that. I want to work through
5 this as best I can chronologically. Bear with me.

6 Fair to say you and Ms. Onley got into an
7 argument when she started bringing up the comments that
8 you said, that the Trump supporters are responsible for
9 the riots. Then you two started the argument; is that
10 right?

11 MR. ELLIOTT: Object to form.

12 THE WITNESS: No. It was you White
13 Trump supporters. That's what got under my
14 skin and that is when and what we started
15 arguing about.

16 BY MR. OLCESSE:

17 Q. Why did that get under your skin?

18 A. Why did it get under my skin? It got under my
19 skin because not all Trump supporters are White.

20 Q. Any other reason?

21 A. Because I'm a Trump supporter.

22 Q. Okay. And prior to October 1st, 2020, had you
23 and Ms. Onley had conversations about current events,
24 what was going on in the country at that time?

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1 A. Yes.

2 Q. Okay. Was there any other occasion that you
3 guys were discussing current events, what was happening
4 in the country where it erupted to arguing as you
5 described and needing to walk out and take a breath
6 like it did on October 1st?

7 A. No. There was disagreement.

8 Q. On October 1st, 2020, did you talk about Black
9 Lives Matter?

10 A. Repeat the question.

11 Q. On October 1st, 2020, you generally described
12 a couple things that were brought up. So I'm asking
13 was Black Lives Matter one of the subjects that was
14 brought up?

15 A. Not directly during that heated exchange.

16 Q. No? Did you and Ms. Onley previously talk
17 about Black Lives Matter?

18 A. Yes.

19 Q. On more than one occasion?

20 A. Yes.

21 Q. Okay. So when Black Lives Matter was brought
22 up prior to October 1st, 2020, what generally was it
23 about?

24 A. It depends on what the question I had and/or

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1 that Connie had at the time but my way was all lives
2 mattered. It wasn't just Black lives matter. It was
3 all lives matter.

4 Q. Was it your understanding after to speaking
5 with Ms. Onley that she was supportive of Black Lives
6 Matter?

7 A. Yes.

8 Q. At any of those discussions you had with Ms.
9 Onley about Black Lives Matter, did she ever tell you
10 that just Black lives matter?

11 A. Can you repeat that?

12 Q. Is any of your discussions about Black Lives
13 Matter with Ms. Onley, did she ever tell you that just
14 Black lives matter?

15 A. That she supports or just Black lives matter?

16 Q. Did she ever tell you that just Black lives
17 matter?

18 A. Yes.

19 Q. Okay. When did she say that?

20 A. In one of many discussions that we have had.

21 Q. Okay. Is it fair to assume then that you were
22 not supportive of Black Lives Matter?

23 A. I'm in support of all lives matter.

24 Q. Did you ever express to Ms. Onley that you

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1 disagreed with maybe what was happening with the Black
2 Lives Matter Movement?

3 A. Yes.

4 Q. What would you express that you disagreed as
5 pertained to the Black Lives Matter Movement?

6 A. Because all lives matter.

7 Q. Okay. All right. Did you and Ms. Onley on
8 October 1st, 2020 talk about the protests that were
9 happening across the country at that time?

10 A. That's how Connie approached me at the sink,
11 that us White supporters are causing the riots in
12 Washington or wherever it was happening and I turned
13 and said it is not us White Trump supporters.

14 Q. Was there ever an occasion that you and Ms.
15 Onley spoke about the protests that were happening
16 across the country prior to October 1st, 2020?

17 A. Yes.

18 Q. Okay. Was it, like, was it a regular topic
19 that you two would talk bring up and talk about when
20 discussing current events and what was happening around
21 the world?

22 MR. ELLIOTT: Object to form.

23 THE WITNESS: Not every day.

24 BY MR. OLCESSE:

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1 Q. Okay. Are you aware who George Floyd is?

2 A. Yes.

3 Q. Who was George Floyd?

4 A. George Floyd is George Floyd.

5 Q. Well, now, I guess my question is, do you know
6 who George Floyd is?

7 A. Yes. He was, resisted an arrest.

8 Q. Do you remember, do you know anything else
9 about George Floyd other than he resisted an arrest?

10 A. He resisted an arrest. He was on drugs.
11 That's it.

12 Q. You don't anything else about George Floyd in
13 terms of the news other than he resisted an arrest and
14 was on drugs; is that right?

15 A. He resisted an arrest and drugs and he was
16 apparently killed by the cop.

17 Q. Okay. When you say apparently killed by the
18 cops, when you say apparently, is that because you
19 don't believe he was killed by the cops?

20 A. I don't like answering that. I have police.
21 I have police in my family. I don't feel comfortable
22 answering that.

23 Q. Well, unfortunately, Ms. McGrory, this
24 deposition, I need you to answer that question.

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1 A. Repeat the question.

2 Q. You said he was apparently killed by police so
3 I just want clarification on apparently. That, for
4 instance, are you saying you don't believe he was
5 killed by the police or something else?

6 A. I don't feel like he was killed by the police
7 officer.

8 Q. Okay. And Mr. George Floyd was Black,
9 correct?

10 A. Yes.

11 Q. Did you ever express to Ms. Onley that you
12 don't believe that George Floyd was killed by the
13 police?

14 A. Yes.

15 Q. And did Ms. Onley ever express to you how she
16 felt about the news regarding George Floyd?

17 A. Yes.

18 Q. What would she tell you about the news
19 regarding George Floyd?

20 A. She would express that a White police officer
21 kneeled on his neck and I would express if he wasn't
22 resisting arrest, he wouldn't have had that happen if
23 he would have just listened to the command given by the
24 police officer.

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1 Q. Okay. And do you know the identity of the
2 name of the police officer?

3 A. Chauvin.

4 Q. And you just came to learn, I assume through
5 the news. Is that accurate?

6 A. Yes.

7 Q. Did you ever hear Ms. Onley express any
8 opinions about that police officer?

9 A. Yes.

10 Q. And what would Ms. Onley say about that police
11 officer?

12 A. That he was White. Why did he have to do that
13 to a Black guy. Why does it only happen with Black
14 people with White police.

15 Q. When she would discuss this with you, make
16 those comments that you said, would you ever respond,
17 say anything?

18 A. You're resisting arrest, you get what you
19 deserve.

20 Q. Okay. Did you ever tell -- back up. I'm
21 sorry.

22 You told Ms. Onley, if I'm correct, George
23 Floyd deserved what happened to him; is that right?

24 MR. ELLIOTT: Object to the form.

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1 THE WITNESS: I didn't directly say
2 George Floyd deserved what he got. I said if
3 he wasn't resisting an arrest, I don't think
4 that it would have ended the way that it did.

5 BY MR. OLCESE:

6 Q. But because he resisted, sitting here today,
7 do you believe he deserved what happened because he
8 resisted?

9 A. No. Nobody deserves to die.

10 Q. Did you ever tell Ms. Onley that George Floyd
11 deserved his fate because he was on drugs?

12 A. No. I don't remember saying that.

13 Q. Well, do you remember discussing with Ms.
14 Onley that George Floyd was on drugs during the
15 altercation that lead to his death?

16 A. Yes. I didn't directly say he deserved to die
17 because he was on drugs.

18 Q. Okay. Did you and Ms. Onley ever discuss, I'm
19 just going to say the public outrage, so to speak,
20 after George Floyd's death?

21 MR. ELLIOTT: Object to form.

22 THE WITNESS: I don't remember.

23 BY MR. OLCESE:

24 Q. Well, do you remember ever discussing with Ms.

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1 Onley the protests that were occurring in response to
2 George Floyd's death?

3 A. There was multiple protests so I don't think
4 that it was just directed at George Floyd.

5 Q. Well, do you remember ever discussing with Ms.
6 Onley protests that were in response to George Floyd's
7 death?

8 A. No.

9 Q. Do you recall a time where Ms. Onley said that
10 she supported the Black people protesting the death of
11 George Floyd?

12 A. No.

13 Q. Was there ever an occasion that you and Ms.
14 Onley talked about the death of Brianna Taylor?

15 A. No.

16 Q. Do you know who Brianna Taylor is?

17 A. No.

18 Q. You never came to learn of a Black police
19 officer that was shot by police in her home?

20 A. After the fact, yes.

21 Q. When you mean after the fact, what do you mean
22 by that?

23 A. Months after it happened.

24 Q. Okay. But you never had a discussion with Ms.

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1 Onley about the protests that occurred throughout the
2 country in response to Ms. Taylor's death?

3 A. I don't remember that, honestly.

4 MR. OLCESE: Yeah. Off the record.

5 -----

6 (Whereupon, a discussion was held off
7 the record.)

8 -----

9 BY MR. OLCESE:

10 Q. You learned after the fact about Ms. Brianna
11 Taylor's death. She was Black, correct?

12 A. I'm assuming.

13 Q. You don't know for sure?

14 A. I don't know.

15 Q. Okay. Do you remember ever speaking with Ms.
16 Onley that Brianna Taylor deserved to die because her
17 boyfriend was on drugs?

18 A. No.

19 Q. You never talked to Ms. Onley about Brianna
20 Taylor's boyfriend using drugs?

21 A. No.

22 Q. If she would testify that you did, is she
23 lying?

24 A. I don't recall talking about, to her about

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1 Brianna Taylor. I'm not very well familiar with that
2 case.

3 Q. And you mentioned October 1st, 2020, Antifa
4 was brought up; is that right?

5 A. Yes.

6 Q. All right. Do you remember talking about
7 Antifa with Ms. Onley prior to October 1st of 2020?

8 MR. ELLIOTT: Object to form.

9 THE WITNESS: Yes.

10 BY MR. OLCESE:

11 Q. That's also a topic you two on occasion would
12 speak about when you worked together?

13 A. Yes.

14 Q. What is your understanding of Antifa? What is
15 Antifa?

16 A. Antifa to me to a group of their own evilness.

17 Q. What does that mean to you, your own words?

18 A. Evil people.

19 Q. Okay. Do you know, does Antifa mean anything,
20 like, the actual acronym, does that mean anything to
21 you?

22 A. No.

23 Q. And did Ms. Onley ever express how she felt
24 about Antifa?

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1 A. No.

2 Q. But you expressed to Ms. Onley that you feel
3 that Antifa are evil people?

4 A. Yes.

5 Q. And when you expressed to Ms. Onley, do you
6 remember how she would respond in any way?

7 A. Curiosity why I felt that way.

8 Q. Would you go into detail why you felt that
9 way?

10 A. Yes.

11 Q. So what would you tell Ms. Onley why you felt
12 Antifa was evil people?

13 A. Because they're causing damage to the country.

14 Q. Okay. Did you say anything else? I'm sorry.
15 Go ahead, please.

16 A. Damage to buildings, damage to people and we
17 would just get into a discussion and we would kind of
18 agree on the same thing.

19 Q. When you talked about Antifa was causing
20 damage to people, damage to property, were you
21 referring to any of the riots that were occurring in
22 2020?

23 A. Any of the riots, yes.

24 Q. And were you expressing to Ms. Onley that you

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1 blame those riots on Antifa?

2 A. No.

3 Q. But you were expressing to Ms. Onley that
4 Antifa was participating in those riots?

5 A. Yes.

6 Q. And on October 1st, 2020, you also mentioned
7 the Proud Boys; is that right?

8 A. Yes.

9 Q. Prior to October 1st, 2020, have you ever
10 talked about the Proud Boys with Ms. Onley before
11 October 1st, 2020?

12 A. No.

13 Q. Okay. So how did the Proud Boys come up on
14 October 1st, 2020?

15 A. Proud Boys came up because Connie would not
16 drop the fact that White Trump supporters were causing
17 problems. She wasn't looking at the big picture that
18 it's not Trump supporters that are causing the issues.
19 It's everything, Antifa, the Proud Boys, Black Lives
20 Matter. Everything was causing issues.

21 Q. Okay. Like you just testified, you brought up
22 the Proud Boys when you were talking about everybody
23 causing problems; is that right?

24 A. Yes. Yeah.

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1 Q. So what are the Proud Boys?

2 A. I don't know exactly what the Proud Boys are.

3 Q. Well, if you don't know exactly, what
4 generally do you know of them? You brought them up.

5 A. They were a group that formed and that were
6 supporters of Trump and Trump supporters.

7 Q. Okay. And are you supporter of the Proud
8 Boys?

9 A. No.

10 Q. Why are you not a supporter of the Proud Boys?

11 A. Because they're evil.

12 Q. Okay. So that's, this is why I don't
13 understand. Why do you say the Proud Boys are evil?

14 A. Because they cause harm and damage.

15 Q. You say cause harm and damage. That's kind of
16 the same way you describe Antifa, causing harm and
17 damaging?

18 A. Yes.

19 Q. Did you ever come to learn or have an
20 understanding that the Proud Boys are considered a
21 White supremacy group?

22 A. No.

23 Q. Never learned that?

24 A. No.

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1 Q. Did Ms. Onley ever express her opinion on the
2 Proud Boys to you?

3 A. Not that I'm aware of.

4 Q. So you don't recall ever a time that she
5 described the Proud Boys as a White supremacy group?

6 A. No.

7 Q. Other than you trying to express to Ms. Onley
8 on October 1st, 2020 that everyone was part of the
9 problem and you say the Proud Boys, do you remember
10 ever referencing the Proud Boys on October 1st, 2020,
11 at any other time on that day?

12 A. No.

13 Q. All right. You talked a little bit about
14 complaining of a cashier's purple hair. Did you ever
15 complain about Ms. Onley's hair?

16 A. No.

17 Q. Did Ms. Onley ever dye her hair during your
18 employment with her?

19 A. No.

20 Q. Did she ever wear her hair in an inappropriate
21 manner you disagreed with?

22 A. In an appropriate -- repeat the question.

23 Q. Sure. Did you ever tell Ms. Onley that you
24 felt she was wearing her hair in an inappropriate

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1 manner during work?

2 A. No.

3 Q. You never at any point told Ms. Onley her
4 hairstyle was offensive to you?

5 A. No.

6 Q. So we talked a little bit about a discussion
7 you and Ms. Onley had. Did you ever share with Ms.
8 Onley that you hold a prejudice against Black people?

9 A. No.

10 Q. Did she ever express to you that she believed
11 you hold a prejudice against Black people?

12 A. Yes.

13 Q. When did that happen?

14 A. Sometime in the meat department. I can't give
15 an exact date.

16 Q. Do you know if it was October 1st, 2020?

17 A. No.

18 Q. It was prior?

19 A. Prior.

20 Q. What did you say when she brought this to your
21 attention?

22 A. I laughed at her. I'm very -- I'm -- I just
23 laugh at people when they bring stuff like that up.
24 That's my response.

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1 Q. You mean stuff like that, just to clarify,
2 what are you talking about?

3 A. That if I have a prejudice against Black
4 people or stuff. I have Black people in my family. So
5 I don't have a prejudice against Black people.

6 Q. So if anyone brings up a prejudice against
7 Black people, your response is just to laugh at them
8 because in your mind, you have Black people in your
9 family?

10 A. Yeah, because I'm not prejudice. I'm myself.

11 Q. Have you ever stated a slur referring to Black
12 people?

13 A. No.

14 Q. You never said the "N" word?

15 A. Not in the meat department, no.

16 Q. But in private?

17 A. Yeah, yes.

18 Q. You never said it in the meat department in
19 the presence of Ms. Onley?

20 A. No.

21 Q. You mentioned that President, former President
22 Trump was brought up on October 1st, 2020, right?

23 A. Yes.

24 Q. I think if I'm correct, you said you are a

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1 supporter of former President Donald Trump; is that
2 correct?

3 A. Yes.

4 Q. Fair to say you're a very adamant supporter
5 of former President Donald Trump?

6 MR. ELLIOTT: Objection to form.

7 THE WITNESS: No, no.

8 BY MR. OLCESE:

9 Q. Did you ever express to Ms. Onley that you
10 were a big supporter of former President Donald Trump?

11 MR. ELLIOTT: Object to form.

12 THE WITNESS: No.

13 MR. OLCESE: Can you repeat your
14 answer?

15 THE WITNESS: Yes.

16 BY MR. OLCESE:

17 Q. How often did you bring that up to Ms. Onley?

18 A. Whenever we would have political
19 conversations. She knew my standing.

20 Q. By your standing, you mean supporting former
21 President Donald Trump?

22 A. Yes.

23 Q. Did Ms. Onley ever express to you that whether
24 she supported or did not support the former president?

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1 A. Yes.

2 Q. What would she tell you?

3 A. She supports him for some things and disagrees
4 with him for other things. That was kind of our
5 conversation all the time because that's how I felt,
6 too.

7 Q. So you would express to Ms. Onley certain
8 things that you disagreed with regarding, I guess
9 former President Donald Trump's policies or
10 administration?

11 A. Yes.

12 Q. What are some of the things you would bring up
13 to Ms. Onley in these conversations that you disagreed
14 with regard to former President Donald Trump?

15 A. The way he talked to people, the way he
16 handled some things.

17 Q. Did you ever share with Ms. Onley that you
18 voted for former President Donald Trump in 2016?

19 A. Yes.

20 Q. Did she ever share with you whether she voted
21 for him in 2016?

22 A. Yes.

23 Q. Did she say she did vote for him or she did
24 not?

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1 A. She did not vote for him.

2 Q. Then did you two have a conversation about
3 whether or not either of you would be voting for former
4 President Donald Trump in 2020?

5 A. Yes.

6 Q. And what would you express to Ms. Onley
7 regarding whether or not you would be voting for former
8 President Donald Trump?

9 A. I expressed to Connie that I would vote for
10 Donald Trump because of what he's done for the country,
11 economic-wise.

12 Q. Did you in fact end up voting for former
13 President Donald Trump in 2020?

14 A. Yes.

15 Q. When you talked to Ms. Onley about this and
16 you'd share with her why you were going to support him
17 and vote for him, what were some of the things you
18 would bring up to Ms. Onley as to why?

19 A. Economy, some of the policies.

20 Q. Anything other than economy and policies?

21 A. No.

22 Q. What, if any, policies did you reference to
23 Ms. Onley when you brought this up?

24 A. Health care policies. I can't think of any

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1 directly right now.

2 Q. That's fine. Like I said before, yeah, like
3 we talked before, if you think of something that pops
4 in to you just through the course of conversation,
5 please let me know. Okay?

6 When you shared with Ms. Onley that, your
7 support to vote for him in 2020, did Ms. Onley ever
8 express whether or not she would support former
9 President Donald Trump?

10 A. She was undecided on who she was going to vote
11 for.

12 Q. She never expressed one way or the other who
13 she was going to vote for in 2020?

14 A. She was more leaning towards Biden.

15 Q. Did you ever express to Ms. Onley that you
16 disagreed with that opinion?

17 A. It was her opinion. I never disagreed.

18 Q. But you just spoke in support of why you were
19 going to vote for former President Donald Trump?

20 A. Yes.

21 Q. Okay. All right. Did you ever express to Ms.
22 Onley that you believed former President Donald Trump
23 was the best president in America's history?

24 A. No.

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1 Q. Do you recall -- do you believe he is the best
2 president in American history?

3 A. Second best president in my history.

4 Q. Curious, who do you believe was the first best
5 president?

6 A. In my life history, Ronald Regan.

7 Q. Did Ms. Onley ever express to you who she
8 thought were her best presidents in history?

9 A. She has but I can't remember.

10 Q. Do you remember if she shared your opinion
11 that Ronald Regan and/or Donald Trump were the best
12 presidents in her lifetime?

13 A. I don't recall.

14 Q. So going to October 1st, 2020, she brings up
15 alleging that White Trump supporters are causing all
16 the problems. You express you don't want to talk about
17 this. Then the Proud Boys gets brought, Antifa gets
18 brought up, a couple other subjects brought up that you
19 just spoke about that you had conversations in the past
20 with Ms. Onley about so why on October 1st of 2020, why
21 was that different in the sense that you got so
22 agitated with her?

23 A. Because she wouldn't stop. She nudges. She
24 was very -- she knows how to get under your skin.

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1 Q. Are you saying that you, prior to October 1st,
2 2020, whenever you two would discuss these topics that
3 there was a point that she would stop but on October
4 1st, she didn't?

5 A. No. She never stopped.

6 Q. Okay.

7 A. But I was in the middle of doing something
8 that I needed to get done or I would have just walked
9 away like I normally do.

10 Q. Okay. I'm sorry?

11 A. But I needed to get it done. I asked her once
12 to stop. I asked her a second time to stop and she
13 didn't and I was just, like, I'm done.

14 Q. Right. Got it. You said that in the past,
15 she would nudge you and that in the past, she would
16 never stop but was there ever an occasion in the past
17 that you got agitated with Ms. Onley to the point of
18 screaming and shouting about that before October 1st,
19 2020?

20 A. Yes.

21 Q. So when did that happen?

22 A. That happened several times throughout the
23 year we worked together.

24 Q. Okay.

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1 A. One time I remember clearly where Connie was
2 out of the room and I had a customer ask for a fillet
3 of salmon, excuse me, a whole piece of salmon and
4 Connie didn't feel that anybody else should do seafood
5 but I was waiting on the customer because she wasn't
6 there. I was having a problem taking the skin off the
7 salmon. Will came over to help me and was showing me
8 how to do it.

9 Connie walked into the room and blew up that
10 Will was helping me and we were taking the skin off the
11 salmon, we were not doing it the right way. It kind of
12 escalated into a little bit of an argument between Will
13 and her as to where Will walked out of the room.

14 Q. That incident you just described, did you do
15 any shouting or yelling at Ms. Onley?

16 A. No.

17 Q. Okay. So what I'm asking about is any time
18 prior to October 1st, 2020 where you felt you and Ms.
19 Onley were discussing certain topics and she wouldn't
20 stop like you said she always did, she never stopped,
21 she would nudge you as you said, that it got to the
22 point where you were so agitated that you screamed and
23 cursed at her like you did on October 1st, 2020?

24 A. No. I always walked out of the room.

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1 Q. You would just walk away?

2 A. Walk away.

3 Q. And it was different on October 1st, 2020
4 because you say you needed to get the dishes done?

5 A. I needed to get the dishes done and it was the
6 way she approached me.

7 Q. What was different about the way she
8 approached you?

9 A. You White Trump supporters. And she said her
10 statement. Then I just turned to her. I looked at her
11 and I said we're not discussing this right now. She
12 just would not stop.

13 Q. Right. And you yelled at her to get her to
14 stop, kept raising your voice, you were agitated. You
15 said get the fuck away from me, something along those
16 lines?

17 MR. ELLIOTT: Object to the form.

18 THE WITNESS: When it first happened, I
19 threw the pan into the sink and I said leave
20 me the fuck alone and shut up and I walked
21 out the door.

22 BY MR. OLCESE:

23 Q. So you threw the pan. Describe how you threw
24 the pan.

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1 A. Well, I was standing at the sink. I threw a
2 pan in a sink of water. Soap suds went everywhere,
3 yes.

4 Q. Was Ms. Onley standing right next to you?

5 A. Next to me.

6 Q. Do you know if she got soap water on her, too?

7 A. I don't know.

8 Q. Have you ever thrown a pan like you said
9 because you were having any conversation with Ms. Onley
10 before October 1st, 2020?

11 A. No.

12 Q. Do you remember any occasion while working at
13 Audubon that you threw a pan prior to October 1st,
14 2020?

15 A. No.

16 Q. Okay. So to get you to throw a pan at that
17 time, am I correct you were very upset?

18 A. I was very angry because she would not stop.

19 Q. And you were very angry because she would not
20 stop after you told her to stop; is that correct?

21 A. Yes.

22 Q. Just so I understand, when she first
23 approached you, you say the way she approached you and
24 said you White Trump supporters, did you start yelling

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1 at her immediately after that comment?

2 A. No. I turned to her. I said we're not having
3 that discussion right now.

4 Q. Then you started raising your voice if I'm
5 correct?

6 A. She kept going, Trump supporters, you White
7 Trump supporters, you're the ones causing the problem.
8 I forget what state it was in. You're the ones that
9 are causing this problem.

10 I threw the pan. I said, Connie, shut the
11 fuck up and leave me alone and go away and I walked out
12 the door.

13 Q. Did you yell and shout and throw that pan as
14 you described in public view, in the patrons' view?

15 A. It wasn't directly the patrons' view because
16 there's a big metal thing that holds the Styrofoam
17 containers that the meat go on. You have to really be
18 looking to see what was going on back there.

19 Q. When you say they really have to be looking
20 but a patron could see what was occurring at that time;
21 is that right?

22 MR. ELLIOTT: Object to form.

23 THE WITNESS: If they were really
24 looking, yes.

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1 BY MR. OLCESE:

2 Q. It's not like you are in a closed room in the
3 back or anything like that, correct?

4 A. Correct.

5 Q. And if a patron can see you, do you believe a
6 patron could have heard an exchange between the two of
7 you as well?

8 A. Yeah, but at that point, I didn't care because
9 I just wanted her to shut up.

10 Q. Let me ask you this, after the exchange, at
11 any point in the future beyond that, did you ever come
12 to learn that a patron had complained about seeing or
13 hearing the exchange between you two?

14 A. No.

15 Q. We talked a little bit earlier about being
16 handed the Redner's handbook. Are you aware Redner's
17 has a policy against workplace violence?

18 A. Yes. That wasn't violent.

19 Q. What wasn't violent?

20 A. Throwing the pan, the water. That's not
21 violent.

22 Q. You don't think it's violent throwing that
23 pan?

24 A. No. Not when you're being nudged by someone

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1 and you're asking a person to stop. It's not violent.
2 That's just trying, you're literally washing the dishes
3 and trying to tell a person to stop.

4 Q. If I'm correct because Ms. Onley wasn't
5 stopping and was nudging you, you believe it was okay
6 what you did, throwing that pan because you needed her
7 to stop?

8 A. Well, it's a natural reaction that when you're
9 constantly telling somebody to stop and they're not
10 stopping and you just throw the pan in the water, then
11 walk away.

12 Q. Well, let me ask you. If Ms. Onley wasn't
13 nudging you, wasn't agitating you like we described
14 happened and just walked by you and you just threw the
15 pan into the sink, do you believe that would be a
16 violent reaction?

17 MR. ELLIOTT: Object to the form.

18 THE WITNESS: No.

19 BY MR. OLCESE:

20 A. So I'm not trying to confuse you. My question
21 is, I got the impression, Ms. McGrory, I thought you
22 say a natural reaction because the way Ms. Onley was
23 acting that she, you know, pushed you to that kind of
24 reaction.

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1 Q. Do you believe it would have been violent if
2 you were not pushed to that reaction by Ms. Onley?

3 A. Isn't violent. I would have been my normal
4 self. I've never been violent at the workplace.

5 Q. Were you able to look at Ms. Onley at the time
6 you threw the pan?

7 A. Yeah. I looked right at her. I told her,
8 leave me the fuck alone.

9 Q. Did you see how she reacted?

10 A. She looked, like, wow. I got her.

11 Q. When you say wow, do you mean, like, mouth
12 open, like, shock?

13 A. Shock, like, she's giving in to me.

14 Q. Did she look like she was kind of scared of
15 you?

16 A. Nope.

17 Q. You say she was shocked but not scared?

18 A. If she was afraid of me, she wouldn't have
19 continued to follow me. She followed me out the meat
20 department, down the hallway with other people hearing
21 me tell her leave me the fuck alone and out the door
22 and continued to follow me out the door.

23 Q. And when she was following you as you say,
24 where was she located?

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1 A. Behind me.

2 Q. Like, right behind you?

3 A. Yes.

4 Q. And what was she doing?

5 A. Sandy, Sandy, let's talk about it. Let's talk
6 about this. There is nothing to talk about. Leave me
7 the fuck alone.

8 Q. Was she trying to apologize for what happened?

9 A. No.

10 Q. Was she trying to, like, comfort you so you
11 would talk about it without yelling?

12 A. No.

13 Q. Was she yelling at you?

14 A. I was blocking her out by the time I got to
15 the door.

16 MR. ELLIOTT: Listen to his question.

17 His question was, was she yelling at you?

18 THE WITNESS: Yes. Sandy, Sandy,
19 yelling.

20 BY MR. OLCESSE:

21 Q. Okay. Do you remember her saying anything
22 else as she was following you as you described other
23 than saying Sandy, Sandy, let's talk about this?

24 A. No.

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1 Q. After October -- well, before what happened on
2 October 1st, 2020, did you ever receive discipline for
3 that event?

4 A. No.

5 Q. Were you ever told by Jim or Karl that you
6 can't have that happen in front of the public's view?

7 A. Yes.

8 Q. But they didn't write you up on it, though,
9 correct?

10 A. No.

11 Q. Have you ever been disciplined during your
12 employment?

13 A. No.

14 MR. ELLIOTT: Andrew, do you mind if we
15 take a break?

16 MR. OLCESE: Yeah. What are you
17 thinking, Jeff, like, until noon?

18 -----

19 (Whereupon, a discussion was held off
20 the record.)

21 -----

22 MR. OLCESE: We'll be back at noon,
23 guys. Thanks.

24 -----

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1 (A short break was taken.)

2 -----

3 BY MR. OLCESE:

4 Q. Oh, we just took an approximately 10, 15
5 minute. During the course of that break, Ms. McGrory,
6 did you speak with your counsel about your deposition?

7 A. No.

8 Q. All right. Okay. I want to show you what I
9 think will probably be the only exhibit I'm going to
10 present today, it's going to be your October 1st, 2020
11 written complaint. And as we spoke about, after you
12 went outside, you had a breather, that's when Jim came
13 out and asked if you were okay and you two walked up to
14 his office to write a statement, right?

15 A. I had to ring the bell to come back in and Jim
16 asked if I was okay and I said no. Then he asked if I
17 would like to write a statement. That's when I wrote
18 the statement.

19 Q. Okay. Ms. McGrory, I'm sharing my screen.
20 I'm showing you an exhibit premarked as D-5. It is a
21 four page exhibit. On the bottom right of each page,
22 there's something called Bates stamped. It just a
23 designation for legal purposes as KS317 and then it
24 goes through to KS320. Do you see the bottom right?

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1 A. Yes.

2 Q. Okay. So I want to start off from the top.
3 Then I'm going to go through it systematically. I'm
4 going to have questions for you. Looking at the first
5 page, do you recognize this document?

6 A. Yes.

7 Q. Do you understand that to be the statement
8 that you provided to Jim on October 1st, 2020.

9 A. Yes.

10 Q. All right. Then on the last page, the fourth
11 page, KS320, is that your signature?

12 A. Yes.

13 Q. All right. If at any point, Ms. McGrory, you
14 need me to scroll in, move up and down so you can read
15 something, let me know. Okay?

16 A. Yes.

17 Q. Okay. All right. So in the first paragraph,
18 you talk about how Ms. Onley complained about gender
19 discrimination; is that right?

20 A. Yes.

21 Q. When do you remember Ms. Onley complaining to
22 you about gender discrimination?

23 A. August, September.

24 Q. Okay. So maybe a month prior to the date of

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1 this statement?

2 A. Yes.

3 Q. Okay. What do you remember Ms. Onley saying
4 when she would complain to you about gender
5 discrimination?

6 A. She just asked do I ever feel like I'm being
7 discriminated against in the department.

8 Q. Based on your gender or based on any reason?

9 A. Any reason.

10 Q. And how would you respond when asked this by
11 Ms. Onley?

12 A. Never, no.

13 Q. Did she ever express to you that she felt that
14 she was being discriminated against?

15 A. Yes.

16 Q. Did she ever explain to you how she felt that
17 she was being discriminated against?

18 A. Her age. More her age.

19 Q. Did she ever say her gender?

20 A. Yes. She mentioned gender for both of us.

21 Q. Okay. Did she ever say race?

22 A. No.

23 Q. Okay. And did you ever come to learn in
24 August or September of 2020 whether or not Ms. Onley

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1 brought complaints of age, gender discrimination to
2 members of Redner's management?

3 A. No.

4 Q. She never told you she complained about that
5 to management?

6 A. No.

7 Q. Okay. And when you guys had that altercation
8 that was described on October 1st, 2020 right before
9 the statement, right, that we talked about earlier, did
10 she bring up at that time that she felt you and her
11 were being discriminated against based on your gender?

12 A. Yes.

13 Q. Okay. How did that come up, during, before
14 you got agitated and walked off, how did that come up?

15 A. Oh, excuse me. No. Not during that.

16 Q. Just to clarify, it wasn't brought up about
17 gender discrimination on October 1st, 2020?

18 A. No.

19 Q. Okay. So why when you start off writing your
20 statement that's the first thing you discuss here?

21 A. Because that was brought up in my mind.

22 Q. Why is that?

23 A. Because I had just been questioned by Marcos
24 about that just recent before this had happened.

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1 Q. Okay. Right before the statement is where
2 you, we talked about you and Ms. Onley raising your
3 voices, right?

4 A. Yes.

5 Q. When you bring up Marcos asking you about
6 gender discrimination, that was before October 1st of
7 2020, right?

8 A. Yes.

9 Q. Do you remember when that conversation
10 occurred?

11 A. A few weeks before.

12 Q. Why to your knowledge sitting here today was
13 that the first thing that popped into your head on
14 October 1st, 2020 when you wrote that statement?

15 A. Because that's what I was thinking.

16 Q. Okay. I'm on the second page, Bates stamped
17 KS318, that top paragraph.

18 MR. ELLIOTT: Andrew, I'm sorry. I
19 have a hard copy of the statement 317 to 321.
20 I'm going to let her look at a hard copy and
21 not have to scroll through.

22 MR. OLCESSE: Whatever's easiest for
23 you.

24 BY MR. OLCESSE:

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1 Q. Other than what is written on those pages, are
2 there any notes written by your counsel on that
3 document?

4 A. No.

5 Q. Okay. All right. I'm looking at the second
6 page.

7 MR. ELLIOTT: Let me just correct that.
8 I just wrote Exhibit-1 on the first page
9 right up here so just so we're clear. I
10 think I know what you're asking, Andrew, but
11 she missed my Exhibit-1 handwritten note that
12 I just wrote.

13 MR. OLCESSE: No. That's fine. I
14 appreciate that, Jeff, making it clear for
15 the record.

16 BY MR. OLCESSE:

17 Q. When I brought that up, I'm talking about any
18 kind of side notes Jeff might have wrote on it other
19 than marking an exhibit that you can refer to?

20 A. No.

21 Q. None of those marks, right?

22 A. No.

23 Q. All right. Thank you.

24 On the second page at the top paragraph, you

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1 write about Connie, quote, continues to play the race
2 card, that section right there, what does that mean?

3 A. Because she always brought up because she's a
4 Black woman and her age.

5 Q. She always brought up that she was a Black
6 woman?

7 A. Black woman, Black female, older Black female
8 and we were in a department where we were surrounded by
9 men and then she talked about issues she had in the
10 Lansdale store in regards to past, in the past.

11 Q. At the time you two were working together at
12 Audubon, I know she was the only Black individual in
13 the meat department. Were you and her the only female
14 employees in the meat department?

15 A. Yes.

16 Q. And did Ms. Olney share with you whether or
17 not she was the only Black employee in the meat
18 department prior at Lansdale?

19 A. She didn't say Black. She just said female.

20 Q. Okay. All right. And you say that she would
21 always bring up she was a Black female. Does that mean
22 that when you and her would have conversations, she
23 would specifically say to you I'm a Black female?

24 A. Yes.

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1 Q. Okay. Do you have any understanding or any
2 more context into during these conversations why she
3 would say she's a Black female?

4 A. Just a Black female in the meat department
5 taking care of seafood.

6 Q. And she expressed to you while working at
7 Lansdale, she felt she was treated differently because
8 of her race and gender?

9 A. Yes.

10 Q. Did she ever tell you who she felt was
11 treating her differently?

12 A. She mentioned Nino's name and there was one
13 other gentleman's name that she said was very mean and
14 I cannot remember his name.

15 Q. Okay. This Nino individual, do you know
16 Nino's last name?

17 A. I do not.

18 Q. Do you know what race or ethnicity Nino is?

19 A. Caucasian.

20 Q. All right. And when you write that she's
21 playing the race card, does that mean you don't believe
22 Ms. Onley was ever discriminated against based on her
23 race or gender?

24 A. I don't feel that she was ever discriminated

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1 against.

2 Q. But you never worked with her at Lansdale,
3 right?

4 A. No.

5 Q. So what is the basis of your feeling that she
6 was never discriminated against at Lansdale?

7 A. I don't know.

8 Q. Okay.

9 A. I just, I don't know.

10 Q. Okay. Does that mean when Ms. Onley would
11 share with you that she felt she was at Lansdale, you
12 don't believe her?

13 A. My response to her was, like, I would like to
14 work with those guys. Oh, you wouldn't like to work
15 with those guys. They're mean.

16 Q. Okay.

17 A. That's what I would get. She would go into
18 some things that took place and it's hard for me to
19 believe.

20 Q. So am I correct then in my assumption that you
21 did not believe when Ms. Onley expressed she felt she
22 was discriminated against in Lansdale?

23 A. Yes.

24 Q. Did Ms. Onley ever express to you

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1 specifically just about race, that she felt she was
2 being discriminated against at Audubon?

3 A. Yes.

4 Q. Who did she ever express to you that she
5 believed was discriminating against her?

6 A. She expressed that to me.

7 Q. Did she ever identify who she believed was
8 discriminating against her at Audubon based on her
9 race?

10 A. Marcos, Shaun.

11 Q. I'm sorry. You said Marcos and then you said
12 another name I didn't hear correctly.

13 A. Shaun.

14 Q. Shaun. Okay. And did you believe that Ms.
15 Onley was being discriminated based on her race by
16 Marcos or Shaun?

17 A. No.

18 Q. Why not?

19 A. Because she wasn't.

20 Q. How do you know?

21 A. Most of the times in the meat department, I
22 spent very little time on the floor. My job was
23 basically in the meat department and I never felt that
24 her nor myself were ever discriminated against.

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rkreporting@gmail.com

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1 Q. Right. So I understand, because you feel like
2 you were never discriminated against, that is why Ms.
3 Onley should feel the same way, right?

4 MR. ELLIOTT: Object to the form.

5 THE WITNESS: I just don't feel she was
6 discriminated against.

7 BY MR. OLCESE:

8 Q. And we talked about your schedules aligning
9 with Ms. Onley about three days per week while working
10 at Audubon, right?

11 A. Yes.

12 Q. So you didn't work with Ms. Onley at all times
13 when she was on a shift, right?

14 A. Besides two days a week, my days off.

15 Q. Did Ms. Onley ever express to you something
16 that she felt was discriminatory against her on one of
17 the days that you did not work with her?

18 A. The way she was spoken to.

19 Q. Okay. And anything else?

20 A. No.

21 Q. Okay. But am I correct that even though you
22 didn't work with her, on these events she would
23 describe when you were not working together, you still
24 did not believe they occurred or were discriminatory?

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1 A. I don't believe they were discriminatory.

2 Q. Okay. All right. The next paragraph on the
3 second page, you talk about approximately on September
4 5th, Connie made a statement to me that she wants to
5 put a dildo in Shaun's coat pocket; is that right?

6 A. Yes.

7 Q. So the discussions about bringing up a dildo,
8 did they begin on September 5th, 2020?

9 A. Yes.

10 Q. Do you remember any time prior to that date,
11 September 5th, 2020, did you ever have any discussions
12 between the two of you about a dildo or sex toys?

13 A. No.

14 Q. And about what you write about putting it in
15 Shaun's coat pocket, did you ever come to learn whether
16 or not Ms. Onley put a dildo in Shaun's coat pocket?

17 A. No.

18 Q. Am I correct that that actually never
19 happened, right?

20 A. It never happened that I'm aware of.

21 Q. I understand from looking at some of, the
22 unemployment transcript and a couple other things, am I
23 correct that you're a fan of the movie 50 Shades of
24 Grey?

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1 A. Yes.

2 Q. Am I correct that that's actually one of your
3 favorite movies, right?

4 A. No.

5 Q. No, that is not correct?

6 A. Not my favorite movie.

7 Q. Did you ever express to Ms. Onley that that
8 was one of your favorite movies?

9 A. It's one of the movies that I like.

10 Q. Okay. Fair enough. Did she ever express to
11 you that it was one of her favorite movies?

12 A. Not favorite. She liked it.

13 Q. When do you remember first talking to Ms.
14 Onley about 50 Shades of Grey?

15 A. September 3rd.

16 Q. Okay. So a couple days before Connie made the
17 joke about putting a dildo in Shaun's coat pocket?

18 A. Yes.

19 Q. Okay. All right. And after talking about 50
20 Shades of Grey, did you suggest to Ms. Onley that she
21 should purchase a dildo because you have one?

22 A. No.

23 Q. You never suggested that Ms. Onley purchase a
24 dildo?

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1 A. No.

2 Q. You never shared with Ms. Onley that you
3 personally own one?

4 A. No.

5 Q. Did you ever talk to Ms. Onley about how to
6 clean a dildo?

7 A. No.

8 Q. So you never told her to not use soap and
9 water on one?

10 A. No.

11 Q. So if Ms. Onley testified that you two did
12 have those conversations as related to 50 Shades of
13 Grey, is she just lying?

14 MR. ELLIOTT: Objection to the form.

15 THE WITNESS: I never said that.

16 BY MR. OLCSE:

17 Q. My question was is she lying if she would
18 testify that you and her had conversations about
19 purchasing and cleaning a dildo as it related to
20 watching 50 Shades of Grey?

21 A. Yes.

22 Q. On September 5th, 2020, do you remember having
23 a conversation about purchasing a dildo off Amazon?

24 A. No.

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1 Q. Did Ms. Onley ever share with you that she
2 purchased one off of Amazon?

3 A. No.

4 Q. Why did you write about events that occurred
5 on September 5th almost a month prior in your statement
6 on October 1st?

7 A. Because my mind was going. I had asked Jim if
8 he wanted everything that took place and everything
9 that just came to my mind is what I wrote down.

10 Q. Okay. And this was on your mind?

11 A. Yes.

12 Q. The conversation about putting a dildo in
13 Shaun's coat pocket on September 5th, did that bother
14 you?

15 A. Yes.

16 Q. Why did it bother you?

17 A. Because Shaun is a very by the book co-worker
18 and if it happened; I actually approached Shaun and I
19 told Shaun what was going to take place the day that it
20 happened, the day that I was told. And I said, listen,
21 if this happens, please be aware that it was not me.

22 Q. Okay.

23 A. And he at the time didn't know what I was
24 talking about. Then I told him. Then the next day,

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1 she had approached Shaun and told Shaun what she was
2 going to do.

3 Q. Right. As, just as we're talking about this
4 since you and I can see each other, it's, like, you're
5 smiling a little bit. Is there a reason you're
6 smiling?

7 A. It's not that I'm smiling. It's just how I
8 get, like, when words were being put in my mouth.
9 Like, I get confused.

10 Q. Well, I'm just trying to ask the questions.
11 Hopefully, I'm not putting words in your mouth, right?

12 A. No. You're not. It's more along the lines of
13 me having the dildos and buying them on Amazon.

14 Q. Okay. All right. And you went to Shaun, you
15 expressed that, hey, this isn't me. Do you remember
16 how Shaun responded, if at all?

17 A. You're kidding. Shaun was very, a very
18 serious person so more or less, you're kidding me.
19 Thanks for the warning.

20 Q. Okay. Okay. And, you know, if this exchange
21 from Ms. Onley when she brought this up to you about
22 putting it in Shaun's coat pocket, if it bothered you,
23 why did you not complain about that when it happened?

24 A. Because I told her I don't think it's a good

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1 idea.

2 Q. Okay. And it sounds like, if this never
3 happened, would you not agree that Ms. Onley thought it
4 wasn't a good idea as well?

5 MR. ELLIOTT: Object to the form.

6 THE WITNESS: She was pretty adamant
7 about it. That's when I'm, like, Connie, I
8 don't think it's a very good idea.

9 BY MR. OLCESE:

10 Q. Right. Ultimately, as you testified earlier,
11 she never went through with it, right?

12 A. No.

13 Q. Okay. All right. So again, my question
14 though, why, if you were concerned about it to the
15 point where you had to express it on October the 1st,
16 why did you not bring it up any days between September
17 5th and September 30th?

18 A. Because it was something I just let go. When
19 this happened on October 1st, everything was just on my
20 mind.

21 Q. And you, in fact, you never complained about
22 Ms. Onley talking about putting a dildo in the coat
23 pocket until October 1st, 2020, right?

24 A. In my statement, yes.

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1 Q. Okay. Yeah.

2 A. And I didn't feel comfortable walking up to a
3 male manager in his office, expressing that this is --
4 I'm kind of private when it comes to that.

5 Q. Right.

6 A. Uncomfortable.

7 Q. Well, you felt comfortable enough on October
8 1st writing it down on a paper office with Jim who is a
9 male, correct?

10 A. But I'm writing that something major just
11 happened. When I asked him if he wants me to just
12 write up what just happened or everything that
13 happened, he was just write down everything that
14 happened. I guess my mind was going from one thing to
15 another to another.

16 Q. But when you said just a moment ago, the
17 reason you didn't complain about it in all of September
18 was because you put it behind you but then as, after
19 October 1st, you didn't put it behind you; is that
20 right?

21 A. Everything just, it came to a halt after
22 October 1st.

23 Q. And after everything we talked about what was
24 said on October 1st between you and Ms. Onley, were

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1 dildos ever brought up during that conversation?

2 A. No.

3 Q. Okay. Were you concerned that you were going
4 to get disciplined for your actions on October 1st?

5 A. Yes.

6 Q. Why were you concerned?

7 A. Because I lashed out.

8 Q. All right. And you felt frankly, just
9 yelling, cursing, if the public could see or hear you,
10 you might get disciplined, right?

11 A. Yes.

12 Q. And you also thought I could be disciplined
13 for throwing the pan?

14 A. No. I was more worried about after I went
15 outside, that I abandoned my job.

16 Q. I see. Okay. So you had these concerns as
17 you left the building and you had these concerns as you
18 were walking up with Jim to make a statement, right?

19 A. Yes.

20 Q. And isn't it correct that you brought up
21 September 5th and comments regarding a dildo from Ms.
22 Onley because you were concerned that you were going to
23 get disciplined on October 1st?

24 A. No.

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1 Q. You're saying you didn't make any of these
2 comments to bring up everything?

3 A. Well, I made -- I didn't bring -- I'm sorry.
4 The way I took it is you were asking me if I only
5 brought it up for that date. Repeat the question.

6 Q. Right. A part of the reason you brought up
7 September 5th was because you were concerned about
8 being disciplined October 5th, October 1st?

9 A. No. I brought everything up because my mind
10 was racing when I asked Jim if he wanted just what took
11 place and he said no. Write everything down.

12 Q. Okay. So you wanted to write everything that
13 went down, not only on October 1st but also, like you
14 said, leading up to it, the build-up so to speak?

15 A. Yes.

16 Q. So you wanted this to be complete with all the
17 information shared, right?

18 A. Yeah.

19 Q. Did Jim, when you were writing a statement,
20 ever cut you off and stop you from finishing it?

21 A. No.

22 Q. Do you believe you accurately put down
23 everything you wanted to write in that statement?

24 A. Yes, yes.

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1 Q. Okay. Are reviewing something right now?

2 A. I know there was a page in there where I had
3 approached Dave Kehm a few weeks before because I had
4 just had a meeting with him a few weeks before about
5 Connie.

6 Q. You had a meeting with Mr. Kehm about those
7 comments you said about discrimination from Onley,
8 right?

9 MR. ELLIOTT: She has a copy of the
10 statement.

11 MR. OLCESE: I believe it's on the
12 second page at the top and the bottom of the
13 first page if you want to refresh your
14 recollection.

15 THE WITNESS: I went to Dave Kehm.
16 Well, I went to Marco several times regarding
17 Connie. And I don't know what Marcos ever
18 did with it. I went to Karl Michener several
19 times about Connie and things that were
20 taking place. And I was just, forget what
21 actually transpired but Dave Kehm came in and
22 I said, Dave, we need to sit down and talk.
23 So right after Dave and I had this discussion
24 is when all this happened.

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1 BY MR. OLCESE:

2 Q. Okay. Are the -- I'm sorry. Go on, please.

3 A. On October 1st.

4 Q. So did you sit down with Dave Kehm on October
5 1st?

6 A. No. About two weeks before.

7 Q. That's what I'm making sure. Very good.
8 Okay.

9 Moving forward in the statement, the bottom of
10 the third page, Bates stamped KS319, that last
11 paragraph, you're talking about the events of October
12 1st, right?

13 A. Yes.

14 Q. Okay. You go on to write that Connie was
15 saying that the White Trump supporters were causing
16 riots. Then you go on to say; let me see if I can find
17 it exactly, on the top of the last page, you go to
18 write at that point, you lost it and screamed loudly,
19 right?

20 A. Yes.

21 Q. Okay. We already talked about what was
22 building up and why you described why you lost it as
23 you say, right?

24 A. Yes.

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1 Q. All right. Looking at the remainder of what
2 you write describing October 1st, 2020, you don't write
3 about throwing the pot. Do you?

4 A. I thought somewhere in there.

5 MR. ELLIOTT: Look at your statement.

6 THE WITNESS: I can see that better.

7 MR. ELLIOTT: She can read your copy
8 better than mine, Andrew.

9 MR. OLCESE: Take your time. Read this
10 section. I'll move if you want to read
11 anything else.

12 THE WITNESS: I don't even know if it's
13 in there. I was doing the dishes.

14 BY MR. OLCESE:

15 Q. Let me start at the top here. October 1st,
16 2020, I'll represent is the first reference, the bottom
17 of Bates stamped KS319. Do you see that, my cursor?

18 A. Yes. I see that.

19 Q. What I'd like to do, take a moment and read
20 this and let me know when you're ready. I'll go to the
21 next page so you can read that as well. Okay?

22 A. No. I didn't write anything about throwing
23 the pot because I just didn't feel it was necessary
24 honestly.

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1 Q. Okay. And just to clarify, I went to the
2 fourth page now, Bates stamped KS320. Do you see
3 anywhere on this page where you brought up throwing a
4 pot?

5 A. No.

6 Q. So you omitted that information because you
7 felt it wasn't necessary?

8 MR. ELLIOTT: Object to the form.

9 THE WITNESS: It was something that
10 happened.

11 BY MR. OLCESE:

12 Q. Right. And you testified earlier that you
13 wanted to put not only everything that happened on
14 October 1st but everything that led to the build-up in
15 your statement, right?

16 A. Yes.

17 Q. If it happened, why did you leave it out?

18 A. Because I don't know why I left it out
19 honestly, like.

20 Q. Is it fair to assume because you were
21 concerned that if you wrote that down, you could be
22 disciplined?

23 A. No.

24 Q. No, you didn't believe you would be

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1 disciplined for throwing a pan?

2 A. No. I was more worried about being
3 disciplined for walking out of the door.

4 Q. I'm sorry?

5 A. I was more worried about being disciplined for
6 walking off, out of the receiving door.

7 Q. Okay. All right. Do you remember ever
8 telling verbally either Karl, Jim or anyone in fact,
9 that you threw a pot on October 1st, 2020?

10 A. I mentioned it to Jim.

11 Q. You may have mentioned it to Jim?

12 A. I did mention it to Jim.

13 Q. When did you do that?

14 A. That day in the office.

15 Q. Okay. So you felt it necessary to mention it
16 to him verbally just not to write it down. Is that
17 accurate?

18 A. What I was writing, this was, my mind was just
19 racing.

20 Q. Right. And what I'm just trying to
21 understand; this will be my last question on this, Ms.
22 McGrory, your mind is racing. You're thinking of
23 everything. You're thinking about September 5th.
24 You're thinking of an incident with a dildo in a coat

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1 pocket. You're bringing up a conversation with Mr.
2 Kehm about two and three weeks prior but you didn't
3 think to mention about throwing a pan that just
4 happened maybe 15 to 20 minutes prior?

5 A. No. I didn't and I don't -- I didn't bring it
6 up because I was afraid of being disciplined. It's
7 just something I didn't write.

8 Q. After you wrote this statement in Jim's
9 office, what did you do immediately next?

10 A. I went to the back room into the meat
11 department.

12 Q. You went back to work?

13 A. Yes.

14 Q. Did you go back to doing the dishes?

15 A. No. They were done.

16 Q. Do you know who did the dishes in your
17 absence?

18 A. No.

19 Q. When you went back to work, was Ms. Onley
20 there?

21 A. Yes.

22 Q. And were you able to finish your shift working
23 with Ms. Onley that day, October 1st, 2020?

24 A. Yes.

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1 Q. Okay. After you wrote your statement, were
2 there any other incidents on October 1st that you had
3 with Ms. Onley?

4 A. No.

5 Q. Did you speak with her at all after writing
6 your statement?

7 A. No.

8 Q. Did she speak to you at all?

9 A. No.

10 Q. Did Marcos ever come up and speak to you about
11 what transpired just earlier between you and Ms. Onley?

12 A. No.

13 Q. Okay. Just so I understand kind of the shift,
14 what time, if you recall, did you end your shift on
15 October 1st?

16 A. Either 2:30 or 3:30.

17 Q. Okay. So with that in mind, can you
18 approximate as best you can when you and Ms. Onley had
19 that 10 to 15 minute altercation where you had to go
20 outside and cool off?

21 MR. ELLIOTT: Object to the form.

22 THE WITNESS: Between 12:45 and 1:15,
23 12:45 and 1:15 because the receiver was still
24 there and when I came back in, the shift had

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1 ended.

2 BY MR. OLCESE:

3 Q. So if I'm correct, after you wrote your
4 statement with Jim and came back to work, you didn't
5 work too much longer because your shift was about to
6 end, right?

7 A. Yes.

8 Q. And at the time your shift ended, did Ms.
9 Onley's shift end was well?

10 A. Yes.

11 Q. Okay. Did you two walk out together?

12 A. No.

13 Q. Did you two talk as you were leaving that
14 shift?

15 A. No.

16 Q. Okay. All right. Did you work the following
17 day, October 2nd, 2020?

18 A. What day was it?

19 Q. Let me see if I can pull it up here. Bear
20 with me. I'll represent October 2nd, 2020 was a
21 Friday.

22 A. Yes.

23 Q. Yes. Okay. After leaving the shift on
24 October 1st, 2020, did you ever work another shift with

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1 Ms. Onley?

2 A. Friday.

3 Q. The 2nd?

4 A. Yes.

5 Q. Okay. And during October 2nd, that shift, did
6 you speak with Ms. Onley at all during that day?

7 A. No.

8 Q. Do you remember her attempting to speak with
9 you at all?

10 A. I want to back up. I think she came in for
11 her shift. That's when I came in, I was informed that
12 she wasn't there and I think that was the day.

13 Q. When you say --

14 A. I didn't directly work with her.

15 Q. Okay. All right. So when you were informed
16 that she wasn't there, were you -- are you saying that
17 she, you were informed she was terminated as of that
18 point?

19 A. No.

20 Q. Okay. And who informed you she wasn't there?

21 A. Marcos at home.

22 Q. Let me ask you this, just kind of nip it in,
23 after your shift on October 1st when you wrote the
24 statement, do you recall ever working another shift

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1 with Ms. Onley?

2 A. No.

3 Q. All right. Did you ever come to learn whether
4 or not members of management spoke with Ms. Onley about
5 your statement?

6 A. No.

7 Q. After you wrote your statement to Jim, did
8 anyone from Redner's management ever come to you to
9 talk and get more information about what happened
10 between you and Ms. Onley on October 1st, 2020?

11 A. No.

12 Q. Okay. Did you ever share with anyone other
13 than Jim at Redner's that you made a statement on
14 October 1st, 2020?

15 A. No, management.

16 Q. So management. Did you ever tell Karl that
17 you made a statement?

18 A. Yes.

19 Q. When did you tell Karl you made a statement?

20 A. A couple days after it happened because Karl
21 was off if I'm not mistaken. Karl was on vacation.

22 Q. When you told him about your statement, did
23 you approach him or did he approach you?

24 A. I can't remember.

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1 Q. Okay. So just to confirm now, other than Karl
2 and Jim, do you remember talking to anyone else at
3 Redner's about your statement that you wrote on October
4 1st, 2020?

5 A. I told Marcos and Shaun I had written a
6 statement but not exactly what was going in the
7 statement.

8 Q. When did you tell Marcos and Shaun about that?

9 A. The next day.

10 Q. Okay. You just said you made a statement but
11 you didn't go into the details of what you wrote,
12 correct?

13 A. Correct.

14 Q. Why do you feel you needed to tell Marcos and
15 Shaun that you wrote a statement about what happened
16 with you and Ms. Onley?

17 A. They asked me if everything was okay and I
18 explained to them no. I needed to get it all off my
19 chest.

20 Q. Since Ms. Onley's termination, have you spoken
21 to her?

22 A. No.

23 Q. Okay. Do you believe that Ms. Onley deserved
24 to be terminated?

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1 A. No.

2 Q. Why not?

3 A. That's just my personal feeling, my opinion,
4 personal opinion.

5 Q. Do you believe she should have received
6 discipline for it, though?

7 A. Yeah.

8 Q. Thinking back sitting here today, do you
9 believe you should have received some form of
10 discipline?

11 A. Yes.

12 Q. Do you think that after what happened on
13 October 1st, 2020, if Ms. Onley was not terminated, you
14 two could have continued to work together?

15 A. No.

16 MR. OLCESSE: Okay. Ms. McGrory, I
17 don't have any further questions. I really
18 appreciate your time unless Jeff has a few to
19 follow up with.

20 MR. ELLIOTT: I have, let me get the
21 camera. I have no questions.

22 Are we placing orders for
23 transcriptions, Cindy?

24 THE COURT REPORTER: Yes.

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1 MR. ELLIOTT: Can you place an order
2 with the mini and an index and an e-mail?

3 THE COURT REPORTER: Sure. May I have
4 your e-mail?

5 MR. ELLIOTT: Sure. It's
6 jelliott@kozloffstoudt.com.

7 -----

8 (Whereupon, the deposition was
9 concluded at 12:53 p.m.)

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C E R T I F I C A T E

I hereby certify that the proceedings and testimony taken by and before me are contained fully and accurately in the notes of testimony, and that the foregoing is a true and correct transcript of the same.

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Court Reporter and Notary Public

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Date: June 17, 2022

Connie Onley v. Redner's Markets, Inc.

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R&K Reporting Inc.
37390 Harmony Drive
Selbyville, Delaware 19975
Phone: 215-946-7009
Email: scheduling@rkcourtreporting.com

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Onley v Redner's Mkets, Inc.

D-5

Oct 1, 2020

I Sandra McGorry have approached Carl Store General manager approx. 2-3 months ago about an issue my Name was brought into by Connie (Seafood Clerk in Meat Dept) about how she feels herself and I are being discriminated against because we are females in the Dept. When I was approached by Meat Dept. Manager about this concern I was caught off guard because by no means do I feel this way at all. And I expressed to Marcos and Carl I do not want my Name in anyway in this. I'm assuming action may have been taken or at least I would hope.

Things have not calmed down and I am constantly on guard with Connie as I've been approached for a second time by Marcos on the above statement.

I just had a sit down with Dave Kemp approx. September 10th in regard to Connie about things she talks about in the meat

Dept. that I don't feel comfortable with. I expressed to Dave that I don't like how Connie continues to play the Race card, Age card, and once again that myself and Connie are discriminated against because we are females. I expressed to Dave I do not feel that way at all.

Approx on Sept. 5th Connie made a statement to me that she wants to put a dildo in ~~Shawn's~~ coat pocket. I advised her it's not a good idea. A few days later Connie in front of several co-workers in the meat Dept. bluntly said how she uses sexual toys and enjoys them. I clearly said out loud I don't care and walked away.

Approx Sept 25th I was making sausage for the meat case and was almost done when Connie came next to me and explained to me she watch 50 Shades of Gray. I turned and said Oh that's my second favorite movie. Connie then very loudly says the movie got

me in such a mood I pulled my dildo out and used it. I looked at her and said I don't care. I then turned and did not realize Shawn was present for the conversation that just took place and was just as shocked as I was.

Later that afternoon I was waiting to use the wrapper to wrap meat. As Shawn was using it @ the time. All of a sudden Connie calls my name and says to me All you need is hot water and sanitizer to clean it. I turned and said what are you talking about she laughed and says my sex toy. Shawn leaves room and I clearly said I don't care.

OCT. 1st 2022 I was doing dishes and Connie started talking about how white Trump supporters are causing all the riots in America and how there is no such thing as a rioter and it's only the Trump supporters causing the issues. I looked at Connie and clearly said enough stop I don't want to hear it. Connie continues

with other Harris in regards
 to it's all the white people doing
 this, I at that time lost it
 screamed loudly at her I don't
 care I don't want to hear any
 more stop it. Walked / Stormed out
 of meat Dept. Connie followed me
 I yelled again I don't fucking care
 stop it. I was very angry I asked
 to go out the receiving door to
 escape AS Connie was behind me
 I went out back to get my mind
 clear and to calm down Connie
 then follows me outside and I
 screamed at her to go away leave
 me alone and I walked up the
 back side of the building took a
 few minutes to calm down then
 came back into building where
 I was met by Jim Asst. GM and
 then walked to office to write up
 the statement.

Sandra McBratt
